1	STATE OF SOUTH C	CAROLINA	IN THE COURT OF	
2	COUNTY OF HAMPTO		COMMON PLEAS	
	D.T. 011122			
3	RICHARD LIGHTSEY CLECKLEY, PHILLI	P COOPER,	: :	
4	ET AL., ON BEHAL AND ALL OTHERS S	: CASE NO. : 2017-CP-25-335		
5	SITUATED,		: :	
6	Plai	ntiffs,	: CONFIDENTIAL : TRANSCRIPT	
7	VS.		: IKANSCKIFI	
8	SOUTH CAROLINA E		: :	
9	COMPANY, A WHOLI SUBSIDIARY OF SC		: :	
10	CORPORATION, AND SOUTH CAROLINA,	THE STATE OF	: :	
11	Def	endants,	: :	
12	SOUTH CAROLINA C	•	:	
13	REGULATORY STAFF		: :	
	Int	ervenor.	: :	
14	(Case Caption Continues on Page 2)			
15				
16	VIDEOTAF	PED DEPOSITION OF	TERRY ELAM	
17	DATE TAKEN:	Monday, October	15, 2018	
18	TIME BEGAN:	12:58 p.m.		
19	TIME ENDED:	5:41 p.m.		
20		<u>-</u>		
21	LOCATION:	K&L GATES, LLP Hearst Tower, 4		
22		214 North Tryon Charlotte, Nort		
23				
24	REPORTED BY:	Cynthia First, EveryWord, Inc.	RPR, CRR, CCP	
25		P.O. Box 1459 Columbia, South	Carolina 29202	
		803-212-0012		

		<u> </u>
1	(Case Ca	aption Continued)
2		
3		THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
4	DOCKET	NOS. 2017-207-E, 2017-305-E, AND 2017-370-E
5	IN RE:	Friends of the Earth and Sierra Club,
6	111 112	Complainant/Petitioner vs. South Carolina Electric & Gas Company,
7		Defendant/Respondent
8	IN RE:	Regulatory Staff for Rate Relief to SCE&G
9		Rates Pursuant to S.C. Code Ann. § 58-27-920
10	IN RE:	Joint Application and Petition of South
11		Carolina Electric & Gas Company and Dominion Energy, Incorporated for Review
12		and Approval of a Proposed Business
13		Combination between SCANA Corporation and Dominion Energy, Incorporated, as May Be
14		Required, and for a Prudency Determination Regarding the Abandonment of the V.C. Summer
15		Units 2 & 3 Project and Associated Customer Benefits and Cost Recovery Plans
16		
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22	ALSO PRESENT:
23	SHANE OSBORNE, Videographer
24	
25	

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3	EXAMINATION	
4	By Mr. Cox	9
5	By Mr. Evans	112
6	By Mr. Keel	129
7	Signature of Deponent	
8	Certificate of Reporter	
9		
10	ELAM EXHIBITS DESCRIPTION	MARKED
11	1 V.C. Summer Integrated Project Schedule Review, August 1, 201	
12	SCANA_RP0880932	<b>I</b> ,
13	2 E-mail correspondence dated 8/ with attached V.C. Summer Inte	
14	Project Schedule Review & Vali SCANA_RP0692496-692508	
15	3 Letter to Ronald A. Jones, fro	m 91
16	Carl Churchman, dated 8/7/15, WEC_SCORS_00001-4	
17	Construction Performance Meeti WE 12/28/14, SCANA_RP0422865-4	J ,
19	5 BLRA Milestone Tracking March SCANA RP0931787-931793	2017, 136
20	6 E-mail correspondence dated 9/	8/16, 147
21	ORS_SCEG_00527443-527454	,
22		
23		
24		
25		

	Terry	Ela	am
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1	THE VIDEOGRAPHER: Good afternoon.	1	TERRY ELAM, being first duly sworn,
2	Today's date is October 15th, 2018, and the	2	testified as follows:
3	time is 12:58 p.m. The witness is Terry Elam.	3	
4	If the counsel would please identify	4	EXAMINATION
5	themselves and whom they represent, then the	5	
6	witness will be sworn in by the court reporter	6	BY MR. COX:
7	after which you may proceed.	7	Q Good afternoon, Mr. Elam.
8	MR. COX: Jim Cox appearing on behalf of	8	A Good afternoon.
9	the South Carolina Office of Regulatory Staff.	9	Q Did I pronounce your name right?
10	MR. EVANS: Jerry Evans on behalf of the	10	A Elam, yes.
11	Plaintiff ratepayers.	11	Q Okay. Mr. Elam, we just met. My name is
12	MR. KEEL: Brandon Keel of the law firm of	12	Jim Cox. I'm an attorney representing the South
13	King & Spalding on behalf of SCE&G and SCANA.	13	Carolina Office of Regulatory Staff in a couple
14	MS. NEWTON: Emily Newton from	14	different legal proceedings. One proceeding is a
15	King & Spalding, also for SCANA and SCE&G.	15	state court action brought by customers of SCE&G
16	MR. HATCH: Ben Hatch from McGuire Woods	16	against SCE&G and SCANA in which the ORS has
17	on behalf of Dominion Energy, appearing in the		intervened.
18	PSC proceedings.	18	The other proceeding in which I represent
19	MR. ELLERBE: Frank Ellerbe on behalf of	19	the ORS is a proceeding before the South Carolina
20	Central Electric Cooperative, appearing in the	20	Public Service Commission. It's a proceeding or a
21	PSC proceedings.	21	consolidated set of proceedings involving recovery
22	MS. SULLIVAN: Tara Sullivan with K&L	22	of costs associated with the V.C. Summer Units 2 and
23	Gates on behalf of Westinghouse.	23	3 project. And now is the time that's set for your
24	MR. MURA: Dave Mura with Westinghouse.	24	deposition in this matter.
25	MR. RYAN: Thomas Ryan from the law firm	25	My first question is: Have you had a
	Page 8		Page 10
1	of K&L Gates, representing Westinghouse.	1	deposition taken before?
2	MR. ELAM: Terry Elam.	2	A No.
3	MR. COX: Telephone appearances?	3	Q Let me just describe to you a little bit
4	MR. CROTTY: Brian Crotty, South Carolina	4	about how a deposition works. Myself and other
5	Public Service Authority.		attorneys present will have the opportunity to ask
6	MS. KIRKLAND: Harley Kirkland, Attorney		you questions.
7	General's Office, for the State of South	7	You just took an oath, and that oath that
8	Carolina.	8	you took is the same oath that you take in a
9	MS. KING: Ariail King from the firm of	9	courtroom. It carries the same weight and penalty
10	Lewis Babcock, for the Plaintiff ratepayers.	10	
11	MS. PITTMAN: This is Jenny Pittman from	11	
12	the South Carolina Office of Regulatory Staff.	12	Do you understand that?
13	MR. COX: I think that's everyone.	13	A Yes, sir.
14	Good afternoon, Mr	14	Q I'll be asking you questions today. And
15	THE COURT REPORTER: May I swear in the	15	if at any point you don't understand a question I
16	witness?		ask, if it's too vague or if I use terms that are
17	MR. COX: Sorry.		incorrect or the question is impossible, if you let
18	THE COURT REPORTER: Please raise your		me know, I'll try to improve the question so that
19	right hand. Do you solemnly swear the		you understand it. However, I can only do that if
20	testimony you are about to give shall be the		you let me know that the question is one that you
21	truth, the whole truth, and nothing but the	21	
22	truth, so help you God?	22	Will you let me know if you do not
23	MR. ELAM: I do.	23	
24	THE COURT REPORTER: Thank you.	24	A I will.
25		25	Q We can take breaks when you need them this
25		25	Q We can take breaks when you need them this

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22

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### Page 11

- 1 afternoon. All you have to do is let me know when
- 2 you need a break. Again, I won't know that you need
- 3 a break unless you let me know. So will you let me
- 4 know if you need a break?
- A Yes, sir, I will.
- Q I'll be asking you about different events
- 7 that occurred in association with the project. And
- 8 I'll be asking about conversations that you might
- <sup>9</sup> have had with other individuals. When I ask for
- 10 information about conversations, I'm not interested
- 11 in any conversations that you had with the
- 12 attorneys, your attorneys and Westinghouse's
- 13 attorneys.
- 14 If, for some reason, if I inadvertently
- 15 ask you a question that calls for information that
- you had with one of the attorneys, feel free to let
- 17 me know, and I'll adjust the question so that it
- 18 doesn't implicate those kind of communications.
- Do you have any questions about how a
- 20 deposition works?
- A No, sir, not at this point.
- 22 Q Okay. What did you do to prepare for your
- 23 deposition today?
- A I had some meetings with the Westinghouse
- 25 attorney, and also Thomas from K&L Gates, reviewed

### Page 12

- $\ensuremath{\mathtt{1}}$  some data that had been presented, but other than
- 2 that, not a lot.
- 3 Q What type of data did you review?
- A I looked at the monthly project report and
- $_{\mbox{\scriptsize 5}}$  some schedules that we had prepared and was in the
- 6 project review meeting format.
- 7 Q What type of format is that that you're
- 8 speaking of?
- 9 A It's pretty much a progress schedule,
- 10 level 1 report that was presented in the project
- 11 review meetings.
- Q So other than those documents you
- 13 mentioned, did you look at any other documents to
- 14 prepare for your deposition?
- 15 A No, sir.
- 16 Q Okay. And you did real well there. There
- 17 might be times when I'll ask a question and you'll
- 18 know halfway through my question what I'm going to
- 19 ask you. You did real well there to hold off and
- 20 wait until I'm done so that we have a clean record.
- 20 Wait until 1 ill dolle so that we i
- I appreciate that.Other than the attorneys, did you talk to
- 23 anyone else to prepare four your deposition?
  - A No, sir.

24

25

Q We deposed a corporate representative of

### Page 13

- 1 Westinghouse last week, Joni Falascino, and she had
- 2 mentioned that in preparation for her deposition,
- 3 she had spoken to several people to become more
- 4 knowledgeable about the project, and that you were
- 5 one of the people she spoke with. Did you speak
- 6 with hor at come point?
- 6 with her at some point?
  - A Yes, I did.
  - Q Can you explain what occurred in that
- 9 conversation?
- 10 A One of the questions was how long was I in
- 11 my current position. What type of information was
- 12 provided on a -- on a monthly basis, weekly basis,
- 13 daily basis?
- I can't think of anything other than that
- 15 that was specific to the preparation for this. It
- 16 was general questions, nothing deep in detail in the
- 17 conversation.
- 18 Q Was it generally about the scheduling
- 19 process on --
- 20 A Yes, sir.
- 21 Q -- the project?
  - A It was.
- Q Okay. And I've already started using the
- $^{24}$  term "the project." And I just want to establish on
- $^{25}\,$  the record what I'm referring to and being sure we

## Page 14

- 1 both understand that.
- When I refer to "the project," will you
- 3 understand that I'm referring to the V.C. Summer
- 4 Unit 2 and Unit 3 construction project?
  - A Yes, sir, I would.
- 6 Q So let's go into your background,
- 7 Mr. Elam. Can you -- first, what is your current
- 8 employment?
- 9 A Currently I'm working as a CNO consultant
- 10 for the ENE Corporation in the country of the UAE.
- Q When you use the term "CNO," what does
- 12 that stand for?
- 13 A Chief nuclear officer.
- Q And what are your duties in consulting on
- 15 that project?
- A My duties deal with schedule and schedule
- 17 review, and mentoring younger scheduling personnel.
  - And how long have you been in that
- 19 position?

18

- A I have been working for them since late
- 21 February of this year.
- Q And who do you work for in that position?
- 23 A As in specifically a manager or --
  - Q Good point. Who was your employer?
- A My employer is ENE, Emirates Nuclear

24

		Terry	Ela	am	
		Page 15			Page 17
1	Energy	Corporation, I believe, is the correct	1	Q	as the project director?
1	termin		2	Α	No.
3	Q	And is that the entity that's building	3	Q	Who preceded Mr. Churchman in his job, if
4	this pr		4	you re	
5	A	Yes.	5	Α	That would have been Ken Hollenbach, I
6	Q	What kind of reactor is it?	6	believe	
7	A	They are designed, developed, and built by	7	Q	Did you ever report to Mr. Hollenbach?
1 -		reans, South Koreans.	8	Ą	Not directly.
		Is it similar to the AP1000?	9	0	
9	Q				Can you summarize what your duties were on
10	A	It's a nuclear power plant.		the pro	
11	Q	Okay. What was your position before that	11	A	My duties on the project were to develop,
	one?		12		in, and implement the integrated project
13	A	Right after from 2008 till end of		schedu	
	Augus	t of 2017, I worked on the V.C. Summer project.	14	Q	Was that your duty throughout your entire
15		September of '17, I went to work for			n the project?
1		y for a six-month period, helping them with	16	A	Yes, it was.
17	some :	schedule-related work.	17	Q	How many employees did you have working
18		And then in February, I went to work for	18	for you	in your position there?
19	the cu	rrent company we were talking about, ENE.	19	A	At the close of the project or is
20	So		20	Q	Let's take it in different time periods.
21	Q	When in 2008 did you start work on the	21	It sour	ds like it changed at some point in time.
22	V.C. S	ummer project?	22	A	It did.
23	A	December.	23	Q	Let's start with when you first began
24	Q	What was your position on the V.C. Summer	24	workin	
25	projec		25	A	2009, I'd say, there was approximately
1			ı		
		Page 16			Page 18
1	A	Page 16  I was the project controls manager over	1	seven:	Page 18 and at the close of the project. I'd say.
	A the sc	I was the project controls manager over	l _		and at the close of the project, I'd say,
2	the sc	I was the project controls manager over hedule.	2	approx	and at the close of the project, I'd say, imately 30.
3	the so	I was the project controls manager over hedule.  And who did you report to during your time	3	approx Q	and at the close of the project, I'd say, imately 30.  And were those employees
3 4	the so	I was the project controls manager over hedule.  And who did you report to during your time t position?	3 4	approx Q A	and at the close of the project, I'd say, imately 30.  And were those employees And those
3 4 5	the so Q in tha A	I was the project controls manager over hedule.  And who did you report to during your time t position?  Many different people over the course of	3 4 5	approx Q A Q	and at the close of the project, I'd say, imately 30.  And were those employees And those I'm sorry. Go ahead.
2 3 4 5 6	the so Q in tha A the ei	I was the project controls manager over hedule.  And who did you report to during your time t position?  Many different people over the course of ght or nine years. Specifically the last	3 4 5 6	approx Q A Q A	and at the close of the project, I'd say, imately 30.  And were those employees And those I'm sorry. Go ahead. Go ahead.
2 3 4 5 6 7	the so Q in tha A the eight	I was the project controls manager over hedule.  And who did you report to during your time t position?  Many different people over the course of ght or nine years. Specifically the last in that I reported to at the close of the	2 3 4 5 6 7	approx Q A Q A Q	and at the close of the project, I'd say, imately 30.  And were those employees And those I'm sorry. Go ahead. Go ahead. You can go ahead and finish.
2 3 4 5 6 7 8	the so Q in tha A the eigensor	I was the project controls manager over hedule.  And who did you report to during your time t position?  Many different people over the course of ght or nine years. Specifically the last in that I reported to at the close of the twas Carl Churchman, Rod Cavalieri and Carl	2 3 4 5 6 7 8	approx Q A Q A Q A	and at the close of the project, I'd say, imately 30.  And were those employees And those I'm sorry. Go ahead. Go ahead. You can go ahead and finish.  That was that was the 30 was the
2 3 4 5 6 7 8 9	the so Q in tha A the eigerson project Churc	I was the project controls manager over hedule.  And who did you report to during your time t position?  Many different people over the course of ght or nine years. Specifically the last in that I reported to at the close of the twas Carl Churchman, Rod Cavalieri and Carl hman.	2 3 4 5 6 7 8	approx Q A Q A Q A people	and at the close of the project, I'd say, fimately 30.  And were those employees And those I'm sorry. Go ahead. Go ahead. You can go ahead and finish.  That was that was the 30 was the that actually reported to me.
2 3 4 5 6 7 8 9	the sc Q in tha A the eic person projec Churc	I was the project controls manager over hedule.  And who did you report to during your time t position?  Many different people over the course of ght or nine years. Specifically the last in that I reported to at the close of the twas Carl Churchman, Rod Cavalieri and Carl hman.  And were you reporting to the project	2 3 4 5 6 7 8 9	Q A Q A People Q	and at the close of the project, I'd say, imately 30.  And were those employees And those I'm sorry. Go ahead. Go ahead. You can go ahead and finish.  That was that was the 30 was the that actually reported to me.  And were those 30 employees were they
2 3 4 5 6 7 8 9 10	the sc Q in tha A the ei- persoi projec Churc Q	I was the project controls manager over hedule.  And who did you report to during your time t position?  Many different people over the course of ght or nine years. Specifically the last in that I reported to at the close of the twas Carl Churchman, Rod Cavalieri and Carl hman.  And were you reporting to the project or during your time on the project?	2 3 4 5 6 7 8 9 10	Q A Q A Q A people Q full-tim	and at the close of the project, I'd say, simately 30.  And were those employees And those I'm sorry. Go ahead. Go ahead. You can go ahead and finish. That was that was the 30 was the that actually reported to me. And were those 30 employees were they be working for you on scheduling issues?
2 3 4 5 6 7 8 9 10 11	the sc Q in tha A the ei- persor projec Churc Q directe	I was the project controls manager over hedule.  And who did you report to during your time t position?  Many different people over the course of ght or nine years. Specifically the last in that I reported to at the close of the ct was Carl Churchman, Rod Cavalieri and Carl hman.  And were you reporting to the project or during your time on the project?  I'm not sure that director was in the	2 3 4 5 6 7 8 9 10 11	Q A Q A People Q full-tim	and at the close of the project, I'd say, fimately 30.  And were those employees And those I'm sorry. Go ahead. Go ahead. You can go ahead and finish. That was that was the 30 was the that actually reported to me. And were those 30 employees were they be working for you on scheduling issues? That's correct.
2 3 4 5 6 7 8 9 10 11 12 13	the sc Q in tha A the eir person project Churc Q directe A title.	I was the project controls manager over hedule.  And who did you report to during your time t position?  Many different people over the course of ght or nine years. Specifically the last in that I reported to at the close of the ext was Carl Churchman, Rod Cavalieri and Carl hman.  And were you reporting to the project or during your time on the project?  I'm not sure that director was in the I'm not sure of Mr. Churchman's exact title	2 3 4 5 6 7 8 9 10 11 12 13	Q A Q A Q A People Q full-tim A Q	and at the close of the project, I'd say, imately 30.  And were those employees And those I'm sorry. Go ahead. Go ahead. You can go ahead and finish. That was that was the 30 was the that actually reported to me. And were those 30 employees were they be working for you on scheduling issues? That's correct. Did it slowly increase from seven to 30 or
2 3 4 5 6 7 8 9 10 11	the sc Q in tha A the eice person projec Churc Q directe A title. at tha	I was the project controls manager over hedule.  And who did you report to during your time t position?  Many different people over the course of ght or nine years. Specifically the last in that I reported to at the close of the it was Carl Churchman, Rod Cavalieri and Carl hman.  And were you reporting to the project or during your time on the project?  I'm not sure that director was in the I'm not sure of Mr. Churchman's exact title t time or Mr. Cavalieri was the director of	2 3 4 5 6 7 8 9 10 11 12 13 14	approx Q A Q A Q A people Q full-tim A Q was th	and at the close of the project, I'd say, simately 30.  And were those employees And those I'm sorry. Go ahead. Go ahead. You can go ahead and finish. That was that was the 30 was the that actually reported to me. And were those 30 employees were they be working for you on scheduling issues?  That's correct.  Did it slowly increase from seven to 30 or ere a sudden shift in the number of people
2 3 4 5 6 7 8 9 10 11 12 13	the sc Q in tha A the eice person projec Churc Q directe A title. at tha	I was the project controls manager over hedule.  And who did you report to during your time t position?  Many different people over the course of ght or nine years. Specifically the last in that I reported to at the close of the ext was Carl Churchman, Rod Cavalieri and Carl hman.  And were you reporting to the project or during your time on the project?  I'm not sure that director was in the I'm not sure of Mr. Churchman's exact title	2 3 4 5 6 7 8 9 10 11 12	approx Q A Q A Q A people Q full-tim A Q was th	and at the close of the project, I'd say, fimately 30.  And were those employees And those I'm sorry. Go ahead. Go ahead. You can go ahead and finish. That was that was the 30 was the that actually reported to me. And were those 30 employees were they be working for you on scheduling issues? That's correct.  Did it slowly increase from seven to 30 or ere a sudden shift in the number of people orked for you?
2 3 4 5 6 7 8 9 10 11 12 13	the sc Q in tha A the eice person projec Churc Q directe A title. at tha	I was the project controls manager over hedule.  And who did you report to during your time t position?  Many different people over the course of ght or nine years. Specifically the last in that I reported to at the close of the ct was Carl Churchman, Rod Cavalieri and Carl hman.  And were you reporting to the project or during your time on the project?  I'm not sure that director was in the I'm not sure of Mr. Churchman's exact title t time or Mr. Cavalieri was the director of MO at that point, and I was reporting to him	2 3 4 5 6 7 8 9 10 11 12 13 14	approx Q A Q A Q A people Q full-tim A Q was th	and at the close of the project, I'd say, simately 30.  And were those employees And those I'm sorry. Go ahead. Go ahead. You can go ahead and finish. That was that was the 30 was the that actually reported to me. And were those 30 employees were they be working for you on scheduling issues?  That's correct.  Did it slowly increase from seven to 30 or ere a sudden shift in the number of people
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these periodic requests that you made over time? A Periodic requests.  Was there a point in time where you felt that you didn't have enough people to be able to get the polone, as far as the schedule? A No. Director of Prior to working on the project, what was Sour position before that? A No. Director of Prior to working on the project, what was Sour position before that? A No. Director of Securical you have seen any seen and seen are seen and seen are seen any seen and seen any seen and seen are seen any seen and seen any seen and seen are seen any seen and seen any seen any seen and seen any seen and seen any seen		Terry Elam					
2			Page 19			Page 21	
3	1	these p	periodic requests that you made over time?	1	before	then?	
Section   Sect	2	Α	Periodic requests.	2	A	I was a contractor working for TVA.	
Second the second th	3	Q	Was there a point in time where you felt	3	Q	What were you	
Social Position   Social Pos	4	that yo	ou didn't have enough people to be able to get	4	Α	Tennessee Valley Authority.	
1	5	the job	done, as far as the schedule?	5	Q	Sorry. What were you doing in that	
8   Your position before that?   9   A   Twas manager of scheduling for GE Power,   15   Specificatily on the STP project and the ESBWR   20   How was that?   21   A   Statisting unit.   22   Was that a nuclear project, as well?   23   A   South Texas project.   24   Browns Ferry Unit 1.   26   A   Was that a nuclear project, as well?   26   A   Was that a nuclear project, as well?   27   A   Browns Ferry Unit 1.   28   Browns Ferry Unit 1.   29   Was that a nuclear project, as well?   29   Was that was the ESWR project?   29   A   Was that a nuclear project, as well?   29   A   Browns Ferry Unit 1.   20   And what was the ESWR project?   20   And what was the ESWR project?   21   A   Was that a law of the STP project?   22   A   Was that a law of the same time frame that the 18   Westinghouse AP1000 was being developed. I do not 20   Was that also a nuclear reactor?   29   A   Westinghouse AP1000 was being developed. I do not 20   A   Westinghouse AP1000 was being developed. I do not 20   A   Was that also a nuclear reactor?   29   A   Westinghouse AP1000 was being developed. I do not 20   A   William Fox   Was that definition of the characters ESBWR.   20   Your work for GE on the STP and ESBWR   21   projects, were those construction projects?   22   A   A   the time I worked for GE, it was 23   engineering and licensing for the construction of 19   A   A   the time I worked for GE, it was 24   engineering and licensing for the construction of 19   Page 20   You work for GE in the STP and ESBWR   22   A   Was that different than the type of 20   A   Was that different than the type of 3   Schedule for constructing construction on those 3   Schedule for constructing construction on those 3   Was that a   Was that	6	A	No.	6	position	n?	
3   A   Lwas manager of scheduling for GE Power,   20   Specifically on the STP project and the ESBWR   21   O   How was that?   11   A   Lwas actually the refurbishment of an   22   Existing unit.   23   O   What is the STP project, as well?   13   O   What unit was that?   14   A   Lwas actually the refurbishment of an   25   Existing unit.   26   O   And what was the ESWR project?   13   O   And were you involved in managing the   15   O   And what was the ESWR project?   15   O   And what was the ESWR project?   16   O   And what was the ESWR project?   17   O   And were you involved in managing the   18   Schedule for that refurbishment?   18   O   How long did you do that job?   19   O   Your work for GE on the STP and ESBWR   19   O   Your work for GE on the STP and ESBWR   19   O   Your work for GE on the STP and ESBWR   19   O   Your work for GE on the STP and ESBWR   19   O   Your work for GE on the STP and ESBWR   19   O   You work for GE on these   20   O   Your work for GE on the STP and ESBWR   20   O   You work for GE on the STP and ESBWR   20   O   Your work for GE on the STP and ESBWR   20   O   You work for GE on the STP and ESBWR   20   O   Your work for GE on the STP and ESBWR   20   O   Your work for GE on the STP and ESBWR   20   O   You work for GE on the STP and ESBWR   20   O   Your work for GE on the STP and ESBWR   20   O   Your work for GE on the STP and ESBWR   20   O   Your work for GE on the STP and ESBWR   20   O   Your work for GE on the STP and ESBWR   20   O   Your work for GE on the STP and ESBWR   20   O   Your work for GE on the STP and ESBWR   20   O   Your work for GE on the STP and ESBWR   20   O   Your work for GE on the STP and ESBWR   20   O   Your work for GE on the STP and ESBWR   20   O   Your work for GE on the STP and ESBWR   20   O   Your work for GE on the STP and ESBWR   20   O   Your work for GE on the STP and ESBWR   20   O   Your work for GE on the STP and ESBWR   20   O   Your work for GE on the STP and ESBWR   20   O   Your work for GE on the STP and ES	7	Q	Prior to working on the project, what was	7	A	I was a schedule manager.	
## specifically on the STP project and the ESBWR ## 12 project. ## 12 project. ## 12	8	your po	osition before that?	8	Q	Was that a construction project?	
1	9	A	I was manager of scheduling for GE Power,	9	A	In sorts.	
2   2   2   2   2   2   2   2   2   2	10	specific	cally on the STP project and the ESBWR	10	Q	How was that?	
3   Q   What unit was that?     3   Q   What unit was that?     3   Q   What unit was that?     4   A   Yes, It is.     5   A   Yes, It is.     6   Q   And what was the ESWR project?     7   A   ESBWR was a new technology that GE was     8   trying to introduce in the same time frame that the     9   Westinghouse AP1000 was being developed. I do not     10   Westinghouse AP1000 was being developed. I do not     10   Westinghouse AP1000 was being developed. I do not     10   Westinghouse AP1000 was being developed. I do not     10   Westinghouse AP1000 was being developed. I do not     10   Westinghouse AP1000 was being developed. I do not     10   Westinghouse AP1000 was being developed. I do not     10   Westinghouse AP1000 was being developed. I do not     10   Westinghouse AP1000 was being developed. I do not     10   Westinghouse AP1000 was being developed. I do not     10   Westinghouse AP1000 was being developed. I do not     10   Westinghouse AP1000 was being developed. I do not     10   Westinghouse AP1000 was being developed. I do not     10   Westinghouse AP1000 was being developed. I do not     10   Westinghouse AP1000 was being developed. I do not     10   Westinghouse AP1000 was being developed. I do not     10   Westinghouse AP1000 was being developed. I do not     10   Westinghouse AP1000 was being developed. I do not     10   Westinghouse AP1000 was being developed. I do not     10   Q   From what time period?     1   Q   New projects.     2   Q   New projects.     2   Q   New projects.     3   Q   New projects.     4   A   New projects.     5   Q   New projects.     6   Q   New projects.     7   A   New projects.     8   A   New projects.     9   Q   New projects.     1   A   New projects.     2   Q   New projects.     2   Q   New projects.     3   Schedule for constructing construction on those     4   New projects.     5   Q   New projects.     6   Q   New projects.     7   A   New projects.     8   A   New projects.     9   Q   New projects.     9   Q   New projects.     1   A   New projec	11	project		11	A	It was actually the refurbishment of an	
1	12	Q	What is the STP project?	12	existing	g unit.	
15	13	A	South Texas project.	13	Q	What unit was that?	
16   Q   And what was the ESWR project?     17   A   ESBWR was a new technology that GE was     18   trying to introduce in the same time frame that the     19   Westinghouse AP1000 was being developed. I do not     10   Gecall the exact definition of the characters ESBWR     10   Q   Is that also a nuclear reactor?     21   Q   Is that also a nuclear reactor?     22   A   Yes, it is     23   Q   How long did you work for GE on those     24   projects?     25   A   Eighteen months.     26   Page 20     1   Q   From what time period?     2   A   2007 to 2008.     3   Q   And why did you leave GE?     4   A   Better opportunity.     5   Q   With Westinghouse?     6   A   Yes. Well, no; with Shaw.     7   Q   Can you describe how you were hired to     10   work on the V.C. Summer project?     11   A   I'm not sure I understand.     12   Q   Did you apply or did someone tell you     13   about the opportunity?     14   A   I knew about the opportunity?     15   elected to seek employment with them.     16   Q   How did you find out about the     17   opportunity?     18   A   I don't remember.     19   Q   Who hired you?     20   A   William Fox.     21   Q   Did he work for Shaw?     22   A   Sixty months, five years.     Q   How long did you do that job?     A   Sixty months, five years.     Q   How long did you do that job?     A   Sixty months, five years.     Q   You work for GE on the STP and ESBWR     D   From what ime period?     A   Sixty months, five years.     Q   You said for new products?     A   New projects.     Q   New projects.     Q   New projects.     Q   New projects. Did you put together a     S   A   Yes, very high level.     G   Q   Was that different than the type of     S   A   Yes, very high level.     G   Q   Was that different than the type of     S   A   Yes, very high level.     G   Q   How did it differ?     A   Level of detail, conceptual versus having     actual completed engineering data and constructors     3   A   V.C. Summer.     4   A   V.C. Summer.     5   Q   Which schedule	14	Q	Was that a nuclear project, as well?	14	A	Browns Ferry Unit 1.	
18 trying to introduce in the same time frame that the 19 Westinghouse AP1000 was being developed. I do not 20 recall the exact definition of the characters ESBWR. 21 Q Is that also a nuclear reactor? 22 A Yes, it is. 23 Q How long did you work for GE on those 24 projects? 25 A Eighteen months.  Page 20 1 Q From what time period? 2 A 2007 to 2008. 3 Q And why did you leave GE? 4 A Better opportunity. 5 Q With Westinghouse? 6 A Yes. Well, no; with Shaw. 7 Q Okay. 8 A I went from GE to Shaw. 9 Q Can you describe how you were hired to work on the V.C. Summer project? 11 A I'm not sure I understand. 12 Q Did you apply or did someone tell you 3 about the opportunity? Were you recruited? 14 A I knew about the opportunities, and I 5 elected to seek employment with them. 15 elected to seek employment with them. 16 Q How did you for Shaw. 17 Q Who hired you? 18 A I don't remember. 19 Q Who hired you? 20 A William Fox. 21 Q Did he work for Shaw? 22 Q Did he work for Shaw? 23 Page 20 24 A At the time I worked for GE, it was 2 projects, were those construction projects? 24 A At the time I worked for GE, it was 2 projects, were those construction projects? 25 A At the time I worked for GE, it was 2 projects, were those construction on the STP and ESBWR 2 projects, were those construction projects? 24 A At the time I worked for GE, it was 2 projects, were those construction projects? 25 A At the time I worked for GE, it was 2 projects, were those construction projects, were those construction of the STP and ESBWR 2 projects, were those construction of the STP and ESBWR 2 projects, were those construction of the STP and ESBWR 2 projects, were those construction of the STP and ESBWR 2 projects, were those construction of the STP and ESBWR 2 projects, were those construction or the STP and ESBWR 2 projects. 22 A At the time I worked for GE, it was 2 projects for GE? 23 A Page 20 24 A New projects. 25 Q You said for new products? 26 A Yes, very high level. 36 A Yes, very high level. 47 A New projects. 48 A Yes, Usid and I new pr	15	A	Yes, it is.	15	Q	And were you involved in managing the	
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20 recall the exact definition of the characters ESBWR. 21 Q Is that also a nuclear reactor? 22 A Yes, it is. 23 Q How long did you work for GE on those 24 projects? 25 A Eighteen months.  Page 20  1 Q From what time period? 2 A 2007 to 2008. 3 Q And why did you leave GE? 4 A Better opportunity. 5 Q With Westinghouse? 6 A Yes. Well, no; with Shaw. 7 Q Okay. 8 A I went from GE to Shaw. 9 Q Can you describe how you were hired to 10 work on the V.C. Summer project? 1 A I'm not sure I understand. 12 Q Did you apply or did someone tell you 13 about the opportunity? Were you recruited? 14 A I knew about the opportunity? Were you recruited? 15 A I don't remember. 16 Q How did you find out about the 17 opportunity? 18 A I don't remember. 19 Q Who hired you? 20 A William Fox. 21 Q Viar work for GE on the STP and ESBWR projects, were those construction projects? 22 A A At the time I worke for GE, it was 23 engineering and licensing for the construction of new projects. 24 A 2 the time I worke for GE, it was 23 engineering and licensing for the construction of new projects. 25 Q You said for new products? 26 A New projects. 27 Q New projects. 28 A A New projects. 29 Q New projects. 20 Q New projects. 20 Q New projects. 21 A New projects. 21 A New projects. 22 Q New projects. 23 Schedule for construction on those 4 nuclear projects for GE? 4 A New projects. 4 A New projects. 24 A New projects. 25 Q New projects. 26 Q New projects. 27 Di you said for new products? 28 A Yes, very high level. 39 Schedule for construction on those 4 nuclear projects for GE? 4 A New projects. 26 Q New projects. 27 Di you said for new products? 28 A Yes, very high level. 39 Schedule for construction on those 4 nuclear projects for GE? 4 A New projects. 20 Q New projects. 21 Di you said for new projects. 22 Q New projects. 23 Di you said for new projects. 24 A New projects. 25 Q New projects. 26 Q New bridge for construction on those 4 nuclear projects for GE? 30 Schedule for construction on those 4 nuclear projects for GE? 30 Schedule for constr	18	trying 1	to introduce in the same time frame that the	18	Q	How long did you do that job?	
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Prior to GE, what was your employment 25 GE, did they have more detailed schedules and you	25	Q	Prior to GE, what was your employment	25	GE, did	they have more detailed schedules and you	

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#### Page 23 Page 25 1 just weren't involved in them, or was the schedule 1 scheduling. You've referred to level 1 and level 2 2 that existed only a conceptual type schedule? 3 Could you describe what -- briefly, what A Conceptual schedule. Do you know if a more detailed schedule 4 each level in a construction schedule there is? 5 A Level 1 would be the most simplest, was not necessary at the GE project? 6 Not at that time. 6 highest level of the schedule. Level 2 would be additional detail that's 7 Q Why was that? 8 Because it was the infancy of the initial 8 bounded by the level 1. 9 design. And level 3 is, again, more granular, 10 Q Was the construction occurring when you 10 still staying within the confines of level 2 and were at the GE project? <sup>11</sup> level 1. 12 No. Q Do they go any -- any further past 13 O Have you ever worked on scheduling for a 13 level 3? 14 nuclear construction project prior to V.C. Summer? 14 Α Not in my experience. 15 Yes. 15 I've seen some papers that refer to a 16 Q Where was that? 16 fully integrated schedule. Can you describe what a 17 Comanche Peak in Texas. Do you want all 17 fully integrated schedule is? of them? It all depends on the basis of the Q Yeah, if you could do that. 19 schedule, but, you know, fully integrated means Grand Gulf in Mississippi; Callaway in 20 that -- in my experience, that engineering, 21 Missouri; Clinton in Illinois. I think that's it 21 construction, and commissioning is all tied together 22 for construction. 22 to -- to show the interfaces between the various Q And you worked on those four projects when 23 different aspects of -- of constructing something. 24 construction was occurring? Q What are the different aspects that get 25 A That's correct. 25 integrated into a nuclear construction schedule? Page 24 Page 26 Q Can you describe the state of the schedule A Engineering, construction, and 1 2 at the V.C. Summer project at the time you came in 2 commissioning. 3 to work on the project? 3 Q Are there any other areas that get A Can you state that again? 4 integrated into a schedule? 5 Sure. 5 A I'm going to say no, but there's always Did a schedule exist at the time that you 6 room for other aspects. 7 came to work at the V.C. Summer project? 7 Q And what do you mean by "room"? Yes. 8 You could have a separate organization for Q And do you know how that schedule was procurement and know that's totally separate, so... 10 created? Was that ever done on the V.C. Summer 11 A No. 11 schedule? 12 What level schedule was it? 12 Α There was procurement. 13 A I would -- in my opinion, it would at best 13 Was that integrated at a certain point in 14 been level 2. And that would have been in December time or was that integrated throughout the schedule of '08 time frame. 15 when you were there on the project? 16 Q Did it surprise you that the schedule that 16 A It was integrated. I don't remember what was in place was at best a level 2 at that time? 17 time frame. A No, it did not. Some point when you were there? 18 18 Q 19 Why didn't it surprise you? 19 Yes. 20 A It was the beginning of the project right 20 Was that an effort you made to integrate 21 after signing of the contract. And I would not have 21 procurement into the schedule? 22 expected any more than what I found at that point. 22 Α Yes. Q Okay. And before we go further in talking Were there any other areas that you 24 about the changes you made, I think it might be 24 integrated into the schedule during your time at the 25 helpful if we discussed the terminology on 25 project?

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Terry Elam Page 27 Page 29 1 Not that I remember. 1 occurred on the project? 2 Did you work for Shaw during your entire A We worked with the individual 3 time on the project? 3 organizations that owned a piece of the IPS, whether No, I did not. 4 it was engineering, or whether it was construction, 5 Can you describe when that changed? 5 or whether it was commissioning, procurement. We Whenever Shaw was sold to CB&I, and then 6 worked with the individuals that owned that data to 7 when CB&I sold to Westinghouse. 7 continually provide updates and continuing to Q So when Shaw was sold to CB&I, you then 8 develop and enhancing what was there. became a CB&I employee; is that right? Were there periodic meetings where that 10 10 information was passed to you or was it as A That's correct. 11 And then when Westinghouse purchased the circumstances dictated, when developments occurred? 12 Stone & Webster portion of CB&I, you became a A Information flowed continuously every --Westinghouse employee? every day. Okay. So the schedule was always 13 14 WECTEC. 14 dynamic, okay, and evolved day to day, hour to hour, 15 Q WECTEC employee? minute to minute. 16 16 Q And that information would get passed to Yes. 17 Did you have employees from other entities 17 you as circumstances dictated; is that --18 in the consortium, besides your own, on the 18 A It was getting passed to the schedulers scheduling team when you were on the project? 19 that supported those organizations daily, hourly. 20 Repeat that again. 20 Q So each of the organizations on the 21 Sure. And let me kind of describe where 21 project had a scheduler who would update information Q 22 I'm going. 22 on that organization schedule, and that information 23 When you worked for Shaw and CB&I, did you 23 would be passed to you for the master schedule, as 24 well? 24 have employees from Westinghouse that were on your scheduling team? 25 There wasn't two separate efforts. It's Page 30 Page 28 A Clarify "team." 1 all one effort. 1 2 "Team," I refer to individuals who 2 So as you stated, there were individual provided you with scheduling information to create 3 schedulers that supported organizations. And they the main schedule. 4 updated the schedule, added additional information 5 From a company other than Shaw or CB&I? 5 or whatever on whatever basis that -- that they had For --6 a change to make.

7 You make it sound like, well, there's a 8 schedule here and it's passed over here. That's not

the way it is. It's a live, living document.

10 Q How many organizations were there that had 11 schedules?

12 A I couldn't answer that.

What were the biggest organizations that

14 you can recall that had schedulers?

Engineering and construction.

Who were the schedulers for those groups?

17 I don't remember.

18 So construction, would that have been an

19 employee for Shaw that was the scheduler?

20 Shaw, CB&I or WECTEC, depending on the

21 time frame you're discussing.

22 Okay.

13

15

16

25

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23 There were Fluor scheduling -- schedulers

24 after 2016 that was involved also.

At what point did the project begin to

So the IPS at that point had a

8 Westinghouse portion and a CB&I portion, or a Shaw

portion. So yes, there were scheduling people from

10 Westinghouse, and there were scheduling people from

11 whichever company it was at the particular time

12 you're asking about, whether they were Shaw or CB&I.

13 But yes, there were Westinghouse people.

14 They didn't work -- they were not one of my

15 employees. Okay. They were part of the

16 organization that met -- made up the IPS.

17

Okay. Can you describe how you went about

18 updating the schedule during your time on the

project? 19

20

22

Could you be more specific? Α

21 Sure.

The -- when you got to the project and you

23 had a schedule, can you describe how that schedule

24 changed, how you went about updating and changing

25 the schedule in response to developments that

Page 31 Page 33 1 have an integrated project schedule? 1 When did that occur? 2 A We had an integrated project schedule I don't recall that there's a magic point 3 whenever I came to work in 2008. 3 in time that this happened. I just -- I don't -- I Q Did it become more integrated over time? 4 don't recall. 5 Yes, it did. 5 Q Was it more like a steady process, the 6 Can you describe how it did? 6 schedule became more detailed and higher-level A The product -- the product, being the throughout your time there? 8 schedule -- continued to evolve with detail; 8 A Yes, sir. 9 therefore, it became more integrated because of the 9 Were there any time periods where your 10 level of detail over time. 10 section did a more thorough review or update to the 11 But, you know, the engineering portion of 11 schedule to increase the level of detail in the 12 the schedule, the construction portion of the 12 schedule? 13 schedule, and the commissioning portion of the 13 A I don't remember a specific time frame schedule was -- was there in 2008. 14 that we just said, "Hey, we're going to stop and add Q Did you take steps to more closely more detail." 15 16 integrate those organizations into the master 16 We did not do that. 17 schedule? 17 Q Can you describe what's in a construction Can you repeat that again? 18 schedule, the events that go into a schedule to Sure. 19 create a nuclear construction schedule? Did you take steps to more fully integrate 20 Simple terms, civil, mechanical, those pieces of the schedule together in the master 21 electrical, commodities to commissioning. 22 schedule? Q I've seen the term "critical path" A I don't -- as the schedule evolved and described on a schedule. Are you familiar with that there was more detail, again, I mean, it just -- the 24 term? 25 25 schedule continued to materialize and develop over Yes, sir. Page 34 Page 32 Q Can you describe what that means on a 1 (the years, which, you know, gave it more 2 integration. It wasn't one day to say, "Hey, we 2 schedule? A Critical path is usually the longest (3) want more integration." It was an evolving, living document over 4 series of activities that get you from the start to 5 time. 5 the completion. Q What types of details were added to the 6 Why is it called the critical path? 7 7 schedule to give it more detail? I can't answer that. 8 Is it the most important path for a A As -- as time went on and we continued to 9 9 work with the engineering and the construction schedule to make the completion date? pieces, the subject matter experts within -- within 10 I wouldn't say so. 11 How does it differ from the other paths 11 construction and engineering had more interface, 12 which allowed for the additional level of detail of 12 that go into the completion of a reactor? construction to -- to evolve. Okay. 13 Repeat that again. And therefore, we were able to get more 14 Sure. 15 granular with all aspects of the schedule. 15 How does the critical path differ from the 16 Q So, like, for a certain event, you were 16 other paths that go into the completion of a 17 able to add more details about the different 17 reactor? 18 18 precursor events that need to occur to get to a Α The critical path is always the longest 19 certain point? Is that a -- is that what you're 19 series of activities that gets you from point A to 20 kind of referring to? point B, which is the latest completion. The other 21 21 paths usually fall within the duration of the A Yes, sir. 22 22 critical path. Q At some point in time, did the schedule 23 move from being, at best, a level 2 to a higher So does that mean that the other paths 24 level schedule? 24 have more give that, if something isn't met, there's 25 25 a potential that the completion could be met versus Certainly.

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	Terry Elam					
Page 35			Page 37			
1 the critical path in which the schedule needs to be	1	Q	More than once?			
2 met for the completion to occur by that date?	2	Α `	Yes.			
3 A I'm going to ask you to repeat that again.	3	Q	More than twice?			
4 Q Yeah, it was complicated. I'm sorry.	4	Α `	Yes.			
5 MR. KEEL: Objection to form.	5	Q	More than three times?			
6 BY MR. COX:	6	Α :	I can't answer.			
7 Q When you say the longest path for the	7	Q	Okay.			
8 critical path, are you referring to the fact that	8	Д	are there any other events that you recall			
9 the schedule depends on that path, meeting the dates	9	occurrin	g that resulted in the critical path			
on that path, in order for the substantial	10	schedule	e not being met out at V.C. Summer?			
11 completion date to also be met?	11	Α :	I can't recall.			
12 A Assuming that that critical path is	12	Q	Shield panel fabrication, was that an			
13 correct.	13	event th	nat a critical path event that wasn't met?			
Q Why does I'm not sure I understand the	14	Α `	Yes.			
15 assumption that you mean there.	15	Q	And do you recall if that happened once or			
Let me rephrase the question. Are you	16	more th	an once?			
17 saying there that if if the assumptions that go	17	Α	Once.			
18 into that critical path are correct, then if that	18	Q	Can you describe the process for revising			
19 schedule is not met on the critical path, then the	19	a sched	ule when you realized that a event on the			
20 substantial completion date is going to be affected?	20	critical p	path has not been met?			
A I'm going to ask you again: Restate that.	21	A (	Will you repeat that? Do I remember			
22 I think we're close.	22	how wo	uld we go about revising the schedule when we			
Q Why is the critical path important?	23	had an e	evolution that didn't support critical path?			
(24) A Because the critical path should be the	24	Q	Correct.			
(25) (shortest collection of activities to get you from	25	A (	Scheduling would identify the issue. We			
Page 36			Page 38			
1 (point A to point B in the time frame that you're	1	would g	et the respective subject matter experts			
working against. So therefore, the rest of the	2	togethe	r and formulate mitigation plans and work			
3 project, assuming that that critical path is	3					
			whatever the issues were. That was our			
4 correct, has to fit within those two points.	4	typical a	approach at being able to work with issues			
(5) What happens if the schedule on the	<b>4 5</b>	typical a	approach at being able to work with issues			
<ul><li>Q What happens if the schedule on the</li><li>critical path isn't met?</li></ul>	<ul><li>4</li><li>5</li><li>6</li></ul>	typical a	approach at being able to work with issues t. What's a mitigation plan?			
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G What happens if the schedule on the critical path isn't met?  A If you don't adhere to the critical path, assuming that it's correct, between your two points, then you would not complete in the given time frame.  Q Did that ever happen on the V.C. Summer  project?  A Yes.  Q When did that happen?  A Many times.  D Do you recall the events that occurred that led to the critical path timeline not being met?  A Not not not specifically at this point.  Q Was module fabrication an element on a critical path that wasn't met at times?  A Yes.	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	typical a like that Q A Q A Q A Q A Q A Q A Q A A Q A	Approach at being able to work with issues to the schedule?  What's a mitigation plan?  Some type of recovery.  Recovery of the schedule?  Yes.  Is that something that's done every time at, a milestone on the schedule is not met?  Yes.  Is it done even when the milestone that's aris not a critical path milestone?  Yes, there were times for that.  How do you go about, as a scheduler, and mitigation strategies?  Again, you get the subject matter experts and let them determine the best avenue and the to the mitigation. It was not a ser's position to do that.  So is it fair to say that your role is to			
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G What happens if the schedule on the critical path isn't met?  A If you don't adhere to the critical path, assuming that it's correct, between your two points, then you would not complete in the given time frame.  Q Did that ever happen on the V.C. Summer  project?  A Yes.  Q When did that happen?  A Many times.  D Do you recall the events that occurred that led to the critical path timeline not being met?  A Not not not specifically at this point.  Q Was module fabrication an element on a critical path that wasn't met at times?  A Yes.	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	typical a like that Q Q A Q A Q Q Q A Q Q Q A Q A Q Q A Q A Q Q A Q	Approach at being able to work with issues to the schedule?  What's a mitigation plan?  Some type of recovery.  Recovery of the schedule?  Yes.  Is that something that's done every time at, a milestone on the schedule is not met?  Yes.  Is it done even when the milestone that's aris not a critical path milestone?  Yes, there were times for that.  How do you go about, as a scheduler, and mitigation strategies?  Again, you get the subject matter experts and let them determine the best avenue and the to the mitigation. It was not a ser's position to do that.  So is it fair to say that your role is to			

Page: 14 (35 - 38)

	y Elam
Page 39	Page 41
1 A It was my job to identify the issue,	1 schedule that you felt was not attainable?
2 not not to direct the subject matter experts or	2 A No, sir.
3 whatever. I would inform my management that we have	3 Q So is it fair to say you thought the
4 an issue that, you know, we need to look into.	4 schedule was challenging, but it always that
5 Q Were you ever involved in the process	5 there was a way to get it met?
6 where the strength of the mitigation effort was	6 A I do.
7 analyzed? "Strength" might be a bad word, but	7 Q Was there a point in time where you felt
8 the the ability of the mitigation effort to	8 (the schedule was particularly challenging, more so)
9 actually mitigate the schedule.	(9) (than other points in time, where you felt like it)
10 A Would you rephrase that again?	(10) would be extremely difficult to meet the schedule?
11 Q Sure.	(11) (A) (I think the schedule was challenging.)
12 When these mitigation efforts were	Q Is that pretty much throughout the
13 identified by the subject matter expert, would you	13 project?
14 kind of accept the mitigation efforts they provided	(14) A Yes. Yes.
	Q Okay. Was there ever a point in time
16 to determine whether it was a valid or a mitigation	(16) (where the schedule was adjusted and the new)
17 effort that was sufficient?	(17) (substantial completion date was identified before
18 A I had no responsibility in the mitigation.	(18) (identifying mitigation strategies that could make
19 That was in the subject matter expert's management	(19) (that schedule be met?)
20 chain or or that group of people responsible for	MR. RYAN: Object to form.
21 the activities that was in jeopardy here. I had	(THE WITNESS: Yeah, you need I don't)
22 no no input as to how valid or invalid it was.	quite understand the question.
Q Were you observing at all any processes	23 BY MR. COX:
24 where subject matter experts would review mitigation	Q Yeah. Let me rephrase that.
25 efforts to determine if those efforts were	When you had to revise the schedule and
Page 40	Page 42
1 achievable?	1 you realized that the substantial completion dates
2 A Yes.	2 for the units had to be adjusted, can you describe
3 Q Can you describe what you observed there?	3 the process that you went through to identify new
4 A I don't have any specific recollection for	4 substantial completion dates for the units?
5 that.	5 A Extensive reviews and challenges were
6 Q And let me make the question more broadly.	6 orchestrated, held by all the organizations
7 I'm interested in finding out whether the consortium	7 involved, and along with along with the client.
8 reviewed the mitigation efforts to determine how	8 So
9 likely they were to be able to be realized or to see	9 Q I'm sorry.
10 if they were actually something that could be done.	10 A a very involved process.
11 And I was wondering if you could maybe share any	11 Q And I'd like to just understand how that
12 information you have about that process to review	(12) process worked from a technical standpoint.
13 (the mitigation efforts.)	(13) Obviously I'm not a scheduler or an engineer, so the
A I would say that the ones that I sat in on	(14) level of technicality, I I probably can't take a
15 were very detailed and well thought through and, you	(15) whole lot. But I would like to understand the
16 know, were achievable. There was a lot to be done	(16) process you went to in identifying these are our new
17 to be able to implement the mitigation strategies.	(17) (substantial completion dates.)
18 And, you know, those were documented and updated o	
(19) a frequent basis.	
0 Was thorough a time where you felt that	20 schedule reports, reviewed by the appropriate
Q Was there ever a time where you felt that	21 postice and adjustments were decreased as a constant
(21) there was a mitigation strategy in place on the	(21) parties, and adjustments made or not made, accepted,
<ul><li>there was a mitigation strategy in place on the</li><li>schedule that was not attainable?</li></ul>	not accepted. Mitigations may be discussed and
<ul> <li>there was a mitigation strategy in place on the</li> <li>schedule that was not attainable?</li> <li>No, sir.</li> </ul>	not accepted. Mitigations may be discussed and would be incorporated at that point.
<ul><li>there was a mitigation strategy in place on the</li><li>schedule that was not attainable?</li></ul>	not accepted. Mitigations may be discussed and

Page: 15 (39 - 42)

#### Terry Elam Page 43 Page 45 1 And who would you provide those reports 1 that worked for me. 2 to? Q Who was the manager who worked for you? A First, they would go to management for Who attended? 4 whichever company I was working for at the given His name is Aaron, A-A-R-O-N, Tibbetts, time, be it Shaw, CB&I, or WECTEC/Westinghouse. 5 T-I-B-B-E-T-T-S. 6 Q What were they being reviewed for? 6 Q What was his job? 7 Accuracy. 7 He was the schedule manager under me that Were there times that your reports were handled the day-to-day processing of the schedule. not accepted? 9 9 Kind of your second in charge? 10 A I don't think so. 10 Α Yes. 11 And how, ultimately, did you and your team 11 Q Was that throughout the project? 12 identify a new substantial completion date when the 12 Yes. The -- yes. 13 schedule was revised? 13 So when you had a change, a significant 14 A When the critical path was ran and all the 14 change to the schedule, is Mr. Young the person from 15 involved parties agreed that, yes, that is a good, 15 the client who you would seek out to discuss that 16 viable critical path. 16 issue with? Was there ever a time when you were told 17 He would be the first interface point, 18 to develop a path that met a certain completion 18 yes. 19 date? In other words, you were given a completion 19 Were there any other significant 20 date and told to find a schedule that would meet 20 interfaces that you had with the client, 21 that date? individuals? 22 A No. 22 Α Mr. Torres infrequently. Was there ever a time where you felt 23 What were -- what was the purpose of your pressured to come up with a schedule that would meet 24 meetings with Mr. Torres? 25 25 a certain completion date? A It would be something dealing with the --Page 44 Page 46 1 No. 1 with the schedule. I don't remember specifics. Is there ever a time where you had a Was there ever times where you would seek 3 dispute with someone from the client or from your 3 him out, as opposed to Mr. Young, for some other 4 own management change about whether the path that 4 reason? 5 you identified could be met? 5 A No, sir. A Q I'd like to go through a couple different 7 Q When you referred to the client, were you time frames on the project. And I know it's been referring to SCE&G? some time, and you may not have specific 9 recollection. Correct. 9 10 Who did you deal with from the SCE&G? 10 But between the 2009 and 2012 time period, 11 There were several different people that I 11 there was a change in the schedule, a change order 12 interfaced with from the client side. 12 16, that resulted in a schedule delay on the 13 Who most commonly did you interact with? 13 substantial completion dates. 14 Kyle Young from the management side more Do you have any recollection as to what 15 often. 15 caused that schedule change? 16 Q Did you meet with him at a set time or was 16 Α Not specifically. 17 it at random times? 17 Generally? 18 A We had a weekly set time that we -- that Generally, the issuance of a license. And 18 19 we met. And that would incorporate the monthly 19 I just -- I can't specifically recall, so I know the 20 issue of the schedule also that we would transmit to delay in the licensing was part of it. 21 them on the 10th of each month. Q Do you recall being part of a team that

23

24

Page: 16 (43 - 46)

Q And that weekly meeting, was it just you

A No. It was several people from -- from

25 his team, and it would be myself and another manager

22

23 and he?

It was a multiweek evolution that a rather

What do you recall about that effort?

reviewed the schedule in mid 2014?

Yes.

O

	Terry	/ Ela	am
	Page 47	Τ	Page 49
1	large group of us kind of sequestered and reviewed	1	A Not specifically.
	the schedule, made changes, and worked on the	2	
- 1	reestablishment of a COD.	3	
4	Q What is a COD?	4	
5	A Commercial operations date.	5	
6	Q Is that	6	O And how did that realization occur? Was
7	A Same as contractually substantial	7	
8	completion.	8	
9	Q So you would view the COD and the SCD as	9	A I think our organization was identifying
10	being the same?	10	the issues associated with the schedule. There
11	A To me, yes.		was there was other efforts going on also that
12	Q Do you recall who was part of that large		were being identified at the same time. I don't
13	group that reviewed the schedule in 2014?	1	
14	A I remember some of the people.	14	Q Those other issues, do you recall what
15	Q Can you identify who you recall being part	15	those were?
16	of that?	16	A Not specifically.
17	A From my group it was myself, Aaron	17	Q Was productivity an issue that was being
18	Tibbetts, Timothy Riddle. And from SCE&G it was	18	looked at, as well, to your knowledge?
19	Kyle Young, Bernie Hydrick, who is a scheduler.	19	A That would have been outside my purview.
20	There was another scheduler from their organization.	20	Q Do you recall
21	I can't remember his name. He was a contractor and	21	A All I can report on is the schedule.
22	he was present.	22	Q Right. And do you recall the level of
23	Q Your microphone fell, Mr. Elam.	23	productivity being a concern, as far as not being at
24	A There was Bernie Hydrick. They had	24	the level needed to support the schedule?
25	another contract scheduler that worked with them. I	25	A I think that was pretty evident by the
	Page 48		Page 50
1	can't remember his name. There was Santee Cooper	1	fact that, you know, when we would do our updates,
2	personnel present. There was also SCE&G financial	2	you know, we were not on schedule. Hence the
3	people there at the same time. That's the and	3	substantial completion dates when we were doing
4	also we had, from from the CB&I side, we had Don	4	those meetings were not on target. So
5	DePierro, who was like our sponsoring manager of	5	Q So is it fair to say that around
6	this evolution was present also.	6	January 2014, you realized that the issues that were
7	Q Do you remember who from Santee Cooper was	7	causing the project to fall behind were such that
8	there?	8	the current schedule could no longer be met and
9	A Marion.	9	needed to be revised?
10	Q Marion Cherry?	10	A I didn't realize that in in January.
11	A Yes.	11	There was an effort ongoing that started in early
12	Q Why was this group reviewing the schedule?	12	January that would have as it progressed, we
13	A I don't remember all the specifics, but we	13	were we were anticipating some issues with that
14	were late to substantial completion.	14	data that was going to be presented.
15	Q So basically you realized that the current	15	So we we knew there was issues. And
16	schedule was no longer going to work?	16	they would continue to manifest in early '14 is the
17	A What do you mean by won't work?	17	reason we wound up in the reviews later that year.
18	Q Good point. Basically you realized the	18	Q When did when did the reviews begin?
19	current schedule couldn't be met?	19	A I don't recall exact date for for that.
20	A (I'm going to answer in my terminology.)	20	Q Was there a gap in time between the
21	Q Please.	21	realization that the current CODs could not be met
22	A The schedule that we were using would not	22	and the beginning of work by this team to identify a
23	support the substantial completion date.	23	new schedule?

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25 occurred?

Q Do you recall when that realization

 $^{24}$  A  $\,$  I don't think there was a gap. It was  $^{25}$  a -- it was a very big process and -- and with the

Page 51 Page 53 1 integration of the schedule, there's a lot of pieces 1 BY MR. COX: 2 and parts to it in organizations that each one of us Q So, Mr. Elam, you have in front of you a 3 had to work through, through our pieces and parts. 3 document that's labeled Exhibit 1. And for the 4 Okav. 4 record, I'm going to reference the page numbers of 5 So I don't think there's a gap. I just 5 that exhibit. It's SCANA RP0880932 through 6 SCANA\_RP0880950. 6 think that the amount of data, and assembling that 7 data and getting it to the schedules just took that 7 Mr. Elam, have you seen this document period of time. That's what I remember. 8 before? 9 Was this a more complex schedule Α Yes. 10 reassessment than the one that had occurred with 10 Q What is it? change order 16 in 2012? 11 It was a presentation put together by 12 Α Yes. 12 myself and the CB&I management personnel of the --13 Q 13 about the schedule review that we had been Do you know why that is? 14 A As I recall, in change order 16, that undertaking in 2014. 15 mainly dealt with construction, where this effort 15 So this is the same review that you were was an engineering/construction effort in 2014. 16 describing before our break regarding the team that 17 The financial people from SCE&G that you 17 was put together after January -mentioned that were part of the group, what did they 18 No, sir. contribute to the schedule reassessment in 2014? 19 Q -- 2014? 20 I have no clue. 20 Between January and August of 2014, is 21 Q They weren't providing you with 21 that your statement? information? 22 22 Yes. Is this -- is this the -- is this 23 23 document a reflection of the work that that review Α No. 24 Q Were you involved at all in the process to 24 that you were describing before the break? 25 determine the cost associated with the -- a A Yes. Page 52 Page 54 1 schedule? Q Okay. And who did -- who was this 2 presentation to? 2 Α No. 3 Who from your company was involved in that I do not recall the presentation itself. process, if you know? 4 The document, I understand, but I do not remember A I don't know. 5 the presentation. 6 Q Okay. And the second page of the document 7 (V.C. Summer Integrated Project 7 has a summary. And it mentions that the integrated 8 Schedule Review, August 1, 2014, project schedule will not be official until this 9 SCANA\_RP0880932, marked Elam Exhibit 9 review is complete. 10 Number 1 for identification.) 10 Do you know when this review was complete? 11 11 A I do not know when this specific review 12 was complete. 12 BY MR. COX: 13 Q Mr. Elam, I've handed you a document 13 Was there any document that you recall that's been marked Exhibit 1. I'd like to ask you 14 that your group published or sent out when the 15 some questions about this document. 15 review was complete? 16 And do you need a break? If you need --16 A I do not. 17 17 A Can we take a break? Okay. Do you recall whether there was 18 18 more review that was conducted after this Q Absolutely. 19 presentation? A And I'll take a look at this. 19 20 THE VIDEOGRAPHER: The time is 2:15 p.m. 20 Yes. 21 and we are off the record. 21 What type of review continued after this 22 (Recess in the proceedings from 2:15 22 presentation? 23 to 2:28.) A It was the one that you questioned me 24 THE VIDEOGRAPHER: The time is 2:28 p.m., 24 about a while ago, in August.

25

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and we are back on record.

That was the joint review process that

Terry Elam Page 55 Page 57 1 happened with SCE&G and Santee Cooper? 1 that from? That's correct. 2 Q Sure. Next to June 2019, it says Q So is it fair to say that the review "Impacted/Partially Accelerated." 4 process that occurred up until the time of this A I can't remember exactly why the word 5 presentation was work that was done by the "impacted" is there other than we were not meeting 6 consortium? 6 the previous substantial completion date. I do not 7 A This was a product that the consortium put 7 know what -- I can't recall specifically what together for the review work from January through, "impacted" means in this sentence. 9 it looks like the end of July here, first of August. The third bullet point under that 10 Q And that process did not involve a joint 10 June 2019 option states, quote: "Fabrication and 11 effort with SCE&G or Santee Cooper; is that right? 11 delivery of the Shield Building panels are based on 12 Did not. 12 the delivery dates provided by the vendor," end 13 Q And the joint review process occurred 13 quote. 14 14 after this presentation; is that right? Can you explain what that means? 15 A Yes. There was knowledge that this was 15 The vendor provided a schedule with given 16 going on, but there was no involvement. 16 dates in it that we had utilized to establish this 17 17 June of 2019 date. Q Okay. And that same page of the document, 18 the summary -- it's actually numbered at the bottom So is it fair to say that if the vendor page 1, because the title page isn't numbered -- it 19 failed in providing the panels on those dates, then 20 includes two different substantial completions, one 20 that would impact the schedule that is put forth 21 of June 2019, which is entitled, "Impacted/Partially 21 here? 22 Accelerated," and then one of December 2018, 22 Α In that scenario, I would say yes. 23 23 "Accelerated." Do you recall who the vendor was that was

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delivering the shield building panels?

Not -- no.

24

25

Page: 19 (55 - 58)

A It appears under the second paragraph, 2 Unit 2, Substantial Completion December 2018, 3 Accelerated, had some additional caveats about 4 the module deliveries for the shield building 5 and CA01, with some additional 6 engineering/procurement/construction/licensing items that would need to be accelerated. Q And what would that result in if that occurred? 10 A Can you be more specific? 11 Sure. Is it fair to say that if those 12 events -- the schedule contemplated an option where 13 if the events listed under that option occurred, 14 then the schedule could be accelerated to 15 December 2018? 16 A That's correct. I would classify that as 17 mitigation.

19 December 2018 option includes additional mitigation

That's the way I read it from this sheet,

Q What does the term "impacted" mean in this

Can you point out where you're reading

efforts that aren't in the June 2019 option?

Can you describe what the difference is

25 between those two options?

24

18

20

21

23

24 context?

Page 58 Q Do you recall whether the vendor was able 2 to provide the shield building panels on the delivery dates that they stated? A I cannot at this point, no. Do you recall whether that turned out to 6 be an issue, the shield building panels, as far as impacting the schedule? 8 Become an issue when? 9 After this presentation. 10 No, I can't. 11 Was it an issue before the presentation, 12 to your recollection? 13 MR. KEEL: I'll just object to form. 14 THE WITNESS: Repeat. BY MR. COX: 15 16 O Sure. 17 Do you recall the shield building panel 18 delivery being a schedule issue at any point in time 19 on the project? 20 The way this reads, yes. 21 What makes you reach that conclusion from 22 the way this reads? 23 Fabrication and delivery of the panels are

24 based on the delivery dates provided by the vendor,

25 meaning that the schedule basis for 2019 is exactly

22 and the way I remember it.

Q So is it fair to say that the

9

16

## Page 59

- 1 as what that says.
- Q But you're not reading into this that the vendor had failed in the past to provide panels on
- 5 A I am not.
- Q There's two critical assumptions listed
   under the next bullet point. Can you describe what
   it means -- what critical assumptions means in this
   context?
- 10 A It meant that if they didn't meet the
  11 commitment specified here, then the June 2019 date
  12 could be impacted, just as what we just talked about
  13 the shield panels.
  14 O Okav. Now, if you could turn to page 3 of
- Q Okay. Now, if you could turn to page 3 of the PowerPoint, Bates numbered 0880935, there's critical path scenarios identified for both scenarios.
- Can you explain in layman's terms what the critical path scenario is for the June 19th date?
- A Yes. The critical path was predicated on the shield building wall panel deliveries from --
- 22 this says NNI, which was the vendor -- Newport News
- 23 Industrial, I think, into the erection schedule.
- 24 Okay.
- So the critical path, with the dates that

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- ${\tt 1}\,$  was provided on page 1 in that line item, that
- 2 bullet, was the leading critical path to the
- 3 completion of the shield building to get to
- 4 substantial completion.
- Q And if those -- if that schedule was not
   met on that path, then that would affect the COD
   date for the unit; is that correct?
- 8 A COD or substantial completion?
- 9 Q Would it make a difference?
- 10 A It just refers to everything as
- 11 substantial completion.
- Q You know, you're right. Let's stick with that. Let's call it substantial completion. Is that correct?
- 15 A Yeah -- repeat your question again.
- 16 Q Sure.
- 17 If the critical path schedule was not met 18 for this June 19 -- June 2019 scenario, then is it
- 19 correct to say that the substantial completion date
- 20 for that unit would not be met?
- A So let's clarify. If the dates are later
- 22 than what was specified in the previous page, where
- 23 we said that the delivery of the panels dates were
- 24 provided by the vendor, if they were later than
- 25 those, depending on which ones they were, yes, it

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- would have been hard to make the completion ofJune 2019.
- It's not a good, clear, easy answer there
- 4 because you don't know which panels were on critical
- $^{5}\,$  path versus which ones weren't. There's a lot of
- 6 detail there. I just want to clarify that. Any one
- 7 single panel being late may not.
  - Q I appreciate that level of detail in your answer.
- One question that your answer made me
- 11 think of is: Is there a potential to identify
- 12 additional mitigation steps once a critical path
- 13 step has not been met, or does the schedule
- 14 automatically get pushed back because all mitigation
- 15 efforts have already been identified?
  - A I would say, at any given point in time,
- 17 there's always opportunity to mitigate.
- 18 Q So if a critical path step is not met,
- 19 then is it fair to say, before extending the
- 20 substantial completion date, you would be sure to
- 21 look to see if there's any mitigation steps that
- 22 could keep the unit on schedule?
- 23 A That is correct. I would do that.
- Q On page 5 and 6 of the PowerPoint, there's
- 25 some graphics. Can you explain generally what these

Page 62

- graphics are depicting?
- A The graphics depict the two different
- 3 scenarios of impacted/partially accelerated and
- 4 accelerated. These are high-level tools that we
- <sup>5</sup> used for the project that were of level 1 detail,
- 6 I'll call it. Maybe a little more than level 1.
- 7 But they clearly depict the two different critical
- 8 paths for those two scenarios, impacted/partially
- <sup>9</sup> accelerated and accelerated.
- Follow the red lines. Those would be the critical path in each one of the scenarios.
- Q At this point in time, did you have a
- 13 level 3 schedule for the project?
  - 4 A Yes.
  - Is this work that your team did in early
- 16 2014, did that move your schedule to a level 3, or
- did one already exist before then?
  - A It existed many years before that.
  - Q Did this process in early 2014, did it
- increase the level of the schedule at all?
- 21 A No.

18

19

22

24

Page: 20 (59 - 62)

- Are you familiar with the term resource --
- "fully integrated resource-loaded schedule"?
  - A That's two different things.
- Q Can you explain how it's two different

	Terry Elam				
	Page 63		Page 65		
1	things?	1	Q Did the schedule you had at the project,		
2	A Integrated schedule is just that, meaning	2	did it was it resource-loaded?		
3	that the the engineering piece, the procurement	3	A No.		
4	piece, the construction piece, the commissioning	4	Q And is that true throughout the time you		
5	piece are all tied together and you get a critical	5			
6	path from birth to death. Okay.	6			
7	And your other terminology I think you	7			
8	used was fully resource-loaded. Was that your	8			
9	terminology?	9	A There yes. One is that we didn't have		
10	Q Fully integrated resource-loaded.	_			
11	A Okay. Resource loading is a totally	11	with the level of detail in the schedule.		
12	separate aspect of a schedule.	12	Two, there was not a requirement to		
13	Q What does it show?	13			
14	A What do you mean? Explain. Explain. I	14			
15	don't understand.	15	there being no requirement placed on the consortium		
16	Q Sure. And it's probably a bad let me	16			
17		17	A Yes. I don't think there was a		
18	rephrase the question.  I'd like to know what a resource-loaded				
1		19	Q (The schedule that you had on the project,		
19 20	schedule means. Are you able to describe that?	20			
	A In very simple terms, it could provide you	_	did it depend upon a certain level of productivity		
21	an insight into the manpower required to do the		from the craft workers?		
22	given evolution or thousands of evolutions.	22	<u> </u>		
23	Q So does it take into account the resources	23			
1	that are available to get the work done?		resource-loaded?		
25	A No.	25			
	Page 64		Page 66		
1	Q What does a resource-loaded schedule show	1	Q Why is it that your schedule		
2	that a fully integrated schedule that's not	2	A That's because the subject matter experts		
3	resource-loaded not show?	3	that provided the durations for the activities had		
4	A So state that again.	4	that baked into their durations and the number of		
5	Q Sure.	5	men that they planned to assign to that given task.		
6	What does a resource-loaded schedule show	6	Q So it's fair to say that the organizations		
7		7	needed to develop their plan as to how productive		
8	resource-loaded does not show?	8	their workers would be, and use that in their		
9	A The only thing that you can derive from a	9	inputs, and then let you know what the dates that		
10	resource-loaded schedule is to be able to look at a	10	they obtained, based on that information, were?		
11	resource histogram, which is no more than an Excel	11	A I'm going to ask you to repeat that again.		
12	spreadsheet, that gives you the manpower required to	12	Q Sure. Let me see if I can make it more		
13	implement the activities, depending on how you	13	simple.		
14	want how much detail you want, whether you want	14	A Yes.		
15	it in hours, whether you want it in shifts, whether	15	Q Is it fair to say that productivity factor		
16	you want it in days, weeks, months.	16	was used by the organizations that provided you		
17	So the only thing the resource schedule is	17	information on the schedule, but it was not		
18	going to show you is what the level of manpower	18	something you needed to know directly to calculate		
19	required for the given evolution will take,	19	the master schedule?		
20	depending on how you've loaded the individual	20	A Yeah. Productivity is more of a function		
21	activities. So, you know, the byproduct from	21	of the cost people, not schedule.		
22	resource loading is to be able to look at a manpower	22	Q And why is that?		
23	histogram over time to see what the requirements are	23	A Because as I stated, the superintendents,		
24	to be able to staff the job or to staff a job or a	24	the construction subject matter experts, when they		
25	given evolution.	25	evaluated whatever the next whatever the		
25	<u> </u>				

#### Terry Elam Page 67 Page 69 1 evolution is, they're just applying, hey, this is 1 don't use all of that total float up for that given 2 how many men it's going to take me to do this work, 2 evolution, okay, there's no impact to the project. 3 okay, in this time period. If it had five days of float and it took Because they knew that if they had a crew 4 you 10 days to finish, you would be five days late 5 of six people, they looked at what the complexity 5 to something. 6 and whatever the -- whatever the commodity task was, Q Is it correct to say, though, that for a 7 task that has no float, if the productivity is not 7 okay, and he said, hey, this is -- this is how many 8 days or hours it's going to take me to do this 8 what is estimated and it's delayed, then that will 9 evolution. Okay. 9 affect the schedule? 10 Q And if they're wrong about that, then if 10 A Productivity has nothing to do with the 11 they incorrectly assume that the workers will be 11 schedule itself. If you don't meet the duration of 12 more productive than they are, then they just have 12 the work laid out, then you have an issue. 13 to hire more workers to meet the schedule; is that 13 Productivity is a cost issue with how much money 14 fair to say? 14 it's costing you to do something. Okay. 15 What we're concerned with with the A I want you to repeat that one again. 16 Yeah. Let me -- let me try to rephrase schedule is, "Hey, did you start the job on time? 17 it. 17 Did you finish it on time?" 18 I want to -- I do want to understand "I started it on time, but I didn't finish 19 it on time." 19 whether the level of productivity can have any 20 impact on the schedule. And let's take your 20 Okay. There could be or could not be an 21 hypothetical of a crew of six people in an 21 impact to something downstream of that. organization, and let's say the unit leader says Were there any times on the project where 23 that, "I think my six people can get this project 23 the schedule was extended due to a lack of done within one month." And that organization 24 productivity in completing or constructing a certain 25 leader tells you that he can hit that milestone in 25 milestone? Page 68 Page 70 one month. And let's say his workers are only half A I won't use the same words you used, but 2 as productive as they should be. 2 yes, there was issues where we didn't finish jobs in Now, my understanding is that he can go --4 one option for the organization leader is to hire 4 something downstream. And, you know, one of the 5 six more people. And to still get that job done in 5 other documents we looked at, I think, earlier, you 6 one month, it's going to cost more, but he's going 7 to get it done on schedule. That's why. But if he doesn't hire more people and it 8 Were you engaged in any negotiations with 9 takes him two months to get that task done, would 10 that lack of productivity have an impact on the 10 for the schedule about whether their productivity 11 schedule? 11 assumptions were reasonable? 12 12 A Not necessarily. That evolution could No.

- 13 have had 200 days of float on it. And just because 14 it took me another 15 days to get it done has no 15 impact on the schedule.
- 16 Q What do you mean by "float"?
  - A So you asked me about critical path
- 18 earlier. Critical path has no float. That's the
- 19 zero total float path of the project.
- You also asked me about other paths
- 21 leading into that. So if it's not critical path, a
- group of activities have what we call in schedule
- 23 terms total float, okay, which means that the total
- 24 float number is equivalent to some value, whether
- 25 you're in days or hours. Okay. And as long as you

- 3 the allotted amount of time that had some impact to 6 know, had us beyond the substantial completion date. 9 the organizations that provided you with information
- 13 Is it fair to say you accepted what they 14 provided you on those issues?
- 15 I'm sure there was pushback at times, but
- 16 I can't recall specific instances. 17 The negotiation or the, I should say, the
- 18 joint effort that you had with SCE&G and Santee
- 19 Cooper after this Exhibit 1 was published, can you
- describe how those -- how that process went?
  - So if I understood the question correctly,
- 22 the subsequent meeting to this, when we basically
- 23 sequestered ourselves and worked through the
- 24 schedule issues?

Page: 22 (67 - 70)

Yes. Can you describe that process?

	Terry Elam				
	Page 71			Page 73	
1	A Yeah. So we as a group, we kind of	1	contro	lling that and identifying them; so not	
2	sequestered ourselves away from the day-to-day	2	specific	cally, that I remember.	
3	evolutions, and we started out in a very basic	3	Q	Did you ever feel that they were pushing	
4	schedule setting and began to analyze the schedule.	4	you to	accelerate the schedule beyond what was	
5	And the first week was of this was strictly based	5	reason	able?	
6	on just the construction aspects and understanding	6	A	I don't I don't think so.	
7	the critical path as it existed. And, you know,	7	Q	Were there ever times where SCE&G and	
8	from that point, we made refinements, reanalyzed the	8	Santee	e Cooper would push for a mitigation effort	
9	schedule.	9	that yo	ou had to say, "No, that's just not feasible"?	
10	You know, this sounds like, you know	10	A	Not that not that I can recall.	
11	I'm sure to you guys, that why did it take so long.	11	Q	The schedule that you arrived at at the	
12	You have to realize, our schedule was very big.	12	comple	etion of this process, is it a schedule that	
13	Okay. And for us just to do a calculation on the	13	you fel	t was attainable?	
14	schedule took 30 to 45 minutes. Okay. So you make	14	A	Yes.	
15	one minor change, you wait 30 to 45 minutes for the	15	Q	Is it fair to say that you didn't	
16	results. Okay. So it was very time-consuming.	16	guarar	tee that that schedule would would result,	
17	And then after after the first week or	17	did you	ן:	
18	so, we started getting other subject matter experts	18	Α	Rephrase or restate.	
19	, , , ,	19	Q	Sure.	
20	additional enhancements. And this just continued on	20		Is the schedule that you came up with at	
1	over over a three-week period or so. So very	21	the en	d of that process in 2014, was that a schedule	
22	I don't want to say intense, but very long days with	22	that yo	ou guaranteed would be met?	
23		23		MR. RYAN: Object to form.	
	you know, making phone calls to subject matter	24		THE WITNESS: One more time.	
25	experts, getting their input, getting the risk	25	BY MR		
	Page 72	1		Page 74	
				Page 74	
1	people in, getting mitigation, you know, pieces	1	Q	Sure.	
2	people in, getting mitigation, you know, pieces developed, you know, as and, you know, these	2	-	Sure. That schedule is an estimate, right,	
3	people in, getting mitigation, you know, pieces developed, you know, as and, you know, these these, you know, impacted/partially accelerated, you	2	Mr. Ela	Sure. That schedule is an estimate, right, am, the schedule	
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3 4 5	people in, getting mitigation, you know, pieces developed, you know, as and, you know, these these, you know, impacted/partially accelerated, you know, accelerated, partially accelerated, there was lots of lots of things that came out of this	2 3 4 5	Mr. Ela A Q	Sure. That schedule is an estimate, right, am, the schedule The schedule is a model. A model. Were you saying it was the most	
3 4 5 6	people in, getting mitigation, you know, pieces developed, you know, as and, you know, these these, you know, impacted/partially accelerated, you know, accelerated, partially accelerated, there was lots of lots of things that came out of this three-week workshop. I can't remember specifics,	2 3 4 5 6	Mr. Ela A Q	Sure. That schedule is an estimate, right, am, the schedule The schedule is a model. A model. Were you saying it was the most schedule that would occur on the project?	
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	people in, getting mitigation, you know, pieces developed, you know, as and, you know, these these, you know, impacted/partially accelerated, you know, accelerated, partially accelerated, there was lots of lots of things that came out of this three-week workshop. I can't remember specifics, but, you know, I know it was it was intense and there was long days there.  Q How did SCE&G and Santee Cooper contribute to that process?  A Lots of questions, lots of challenges. I can't remember specifics, but, you know, they had they had their construction people attending off and on also, people in and out.  But, I mean, they were a voice. And we reconciled whatever concerns they had or you know, we as a group decided how to move forward. So they were interactive, if that's what you're looking for. They weren't just in the room. So they were interactive with the whole process going on for that three weeks.  Q Were they pushing you to identify	2 3 4 5 6 7 8 9 10 11 12 13 (14 15) (16) 17 (18) (19) (20) (21)	Mr. Ela A Q likely s  BY MR Q 2014, schedu that yo A though project	Sure. That schedule is an estimate, right, am, the schedule The schedule is a model. A model. Were you saying it was the most schedule that would occur on the project? MR. RYAN: Object to form. MR. KEEL: Same. THE WITNESS: The schedule was achievable. COX: So this schedule that you came up with in it is it fair to say that it's an achievable ale that you believed could be attained and but hoped would be attained? Hope is not a plan, so I'll say that we not it was achievable. Is it a schedule that you thought would be not likely schedule that resulted on the set likely schedule that resulted on the set likely schedule that resulted was achievable. THE WITNESS: The schedule was achievable. COX:	
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	people in, getting mitigation, you know, pieces developed, you know, as and, you know, these these, you know, impacted/partially accelerated, you know, accelerated, partially accelerated, there was lots of lots of things that came out of this three-week workshop. I can't remember specifics, but, you know, I know it was it was intense and there was long days there.  Q How did SCE&G and Santee Cooper contribute to that process?  A Lots of questions, lots of challenges. I can't remember specifics, but, you know, they had they had their construction people attending off and on also, people in and out.  But, I mean, they were a voice. And we reconciled whatever concerns they had or you know, we as a group decided how to move forward. So they were interactive, if that's what you're looking for. They weren't just in the room. So they were interactive with the whole process going on for that three weeks.  Q Were they pushing you to identify	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	BY MR Q 2014, schedu that yo A though Q the mo	Sure. That schedule is an estimate, right, am, the schedule The schedule is a model. A model. Were you saying it was the most schedule that would occur on the project? MR. RYAN: Object to form. MR. KEEL: Same. THE WITNESS: The schedule was achievable. COX: So this schedule that you came up with in is it fair to say that it's an achievable alle that you believed could be attained and but hoped would be attained? Hope is not a plan, so I'll say that we set it was achievable. Is it a schedule that you thought would be ost likely schedule that resulted on the tax.  MR. RYAN: Object to form. THE WITNESS: The schedule was achievable. COX: When you say "achievable," did you feel at was the earliest that the project could be	

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#### Page 75 Page 77 1 MR. RYAN: Object to form. It's very important. I appreciate you 2 THE WITNESS: I think, when you develop a 2 doing that. schedule, you build the schedule to be 3 Do you know if the risk connected with a 4 achievable in the shortest amount of time that 4 mitigation strategy being effective was reflected in 5 is implementable. 5 some way in the schedule you developed? 6 BY MR. COX: Disconnect the risk piece of your 7 Q And that's what this schedule was? 7 question. The mitigation would have been reflected 8 Yes. 8 in the schedule at some point once all the details Did you assign risk factors to the 9 were worked out. 10 10 likelihood of different mitigation strategies being If the mitigation didn't come to fruition, 11 effective? 11 then we would show the deltas in the schedule. I 12 mean, you have no choice. If you can't mitigate it, Α I did not. 13 Q Was that done by anyone? 13 okay, then you have to show the impacts from the 14 14 item in the schedule. Α Yes. 15 Q Who did that? Q Let me do a hypothetical so that -- I 16 That was under Lisa Cazalet. 16 think it might help you realize the point I'm trying Α 17 17 to get at and whether I'm -- I've got some point Q Were you involved in her work on that 18 area? 18 that doesn't make any sense or not. I was a science 19 Α Yes. undergrad major, but that doesn't count for much. 20 20 What was your involvement? Let's say you identify a mitigation 21 To -- to either schedule the mitigation or 21 strategy on a certain task. And let's say that 22 attend the mitigation meetings and understand where 22 mitigation strategy is assessed to have a 90 percent 23 we were with the mitigations. Some mitigations were 23 likelihood of success, so it's viewed as being a 24 24 taken in the schedule and some were not. strategy that is very likely to be successful. 25 25 And were some not taken in the schedule But let's say elsewhere on that critical Page 76 Page 78 1 path you have a mitigation strategy that you because they were viewed as too risky? 2 A No. No. It just took a while for some of 2 identify as only being about 10 percent likely to be the mitigation strategies to mature. 3 successful, so maybe a Hail Mary, a long shot. Q What would happen if Ms. Cazalet 4 You're going to have a tough time making that 5 identified a mitigation strategy that had a low 5 mitigation strategy work, but you can't exclude it probability of success? How would that impact the 6 as potentially being an option. schedule? Did your schedule at all reflect the 8 MR. KEEL: Object to the form. 8 likelihood of a strategy being effective or not 9 9 effective? So let's take that 10 percent example. THE WITNESS: I don't really know how to 10 answer that, because I don't remember the 10 Would your schedule say, well, it has a chance, so 11 specifics about all the -- the mitigation we're going to incorporate it into the schedule as 12 efforts or the risk efforts. So I can't help 12 though it is going to occur, or would there be some 13 you there. 13 discount on it to reflect the concern that it might 14 not be effective? 14 BY MR. COX: 15 Q Do you know if the risk connected with a 15 MR. KEEL: Object to form. 16 mitigation strategy being effective was reflected in 16 MR. RYAN: Object to form. 17 17 some way in the schedule you developed? THE WITNESS: We would have shown the 18 18 impact from the likelihood of it not being Repeat again. 19 19 Do you know if the risk connected with the successful. Okay. We were not -- we did not 20 mitigation strategy being effective was reflected in hide the fact -- "hide" is probably not the 21 some way in the schedule you developed? 21 right word. But in many cases, we would show 22 22 Yes, at some point. the impacts of these items that had a low 23 23 And how -likelihood of being able to be achieved. 24 24 Repeat that question one more time. I Now, there's a little more to the story in want to be sure I understood what you're asking me. that we would provide up the data that says,

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#### Page 79 Page 81 1 even with the mitigations of this item, you that authority. 2 know, and the impacts from it not being 2 BY MR. COX: 3 3 successful -- okay. That's basically where the Q So the mitigation strategies came from the 4 schedule was when the item was identified that 4 organizations and you implemented them into the 5 it needed to be mitigated. It was already a schedule; is that correct? 6 problem. We knew the impacts from it, okay, 6 If there was one, that's correct. 7 7 and it's there, you know. On page 10 of Exhibit 1, page 10 of the 8 The mitigation strategy goes into effect. PowerPoint, can you describe what this graphic 9 9 We didn't take credit for mitigation until we shows? 10 knew it was going to be successful. Okay. 10 A We call these a PivotTable to graphically 11 So I think I've answered your question 11 show the differences in the different schedules from 12 because it sounded like you were saying, "Okay." 12 the baseline, original baseline versus the change 13 You said you were going to save four weeks off 13 order 16 agreement. Okay. of this project, but it's only a 10 percent 14 14 And then the bottom two lines represented 15 chance. So therefore you went ahead and took 15 the two scenarios that was listed at the beginning 16 credit for it." 16 of the -- of the presentation for accelerated and 17 No, we didn't. 17 impacted/partially accelerated. And it describes 18 BY MR. COX: 18 the certain milestones that were along the critical Q I think you did get to it in your answer paths of the project. 20 there at the end. It sounded like you're saying 20 Q Can you turn to the next page, pages 11 21) that you required really solid evidence that a 21 through 14, and explain what's reflected in that 22 mitigation strategy would be effective in order to 22 chart? 23 allow it to be reflected on your calendar. Is that 23 Okay. On page 11 and 12 are the Base Load 24 right? 24 Review Act milestones with their dates that were 25 25 previously identified as targets for -- to meet the A That's correct. Page 80 Page 82 Q Okay. Was there a specific threshold of 1 requirements of the Base Load Review Act. 2 certainty that you used? 2 Q What does "Primavera Activity ID" mean? I'm going to say no. No. So in the schedule itself, every activity 4 has a unique number. And that is the tracking Was it not very -- I'm sorry. Go ahead. We were more about a deterministic number in the schedule for that given evolution. 6 schedule versus a risk-based schedule. Okay. Q What does "Reset Milestone Date" mean on that chart? 7 Deterministic being here's the facts; here's the 7 8 durations, okay; and here's the impacts from it. 8 A I can't answer that. 9 Okay. There's a column labeled "Delta The risk and the mitigation strategies 10 Months from Reset Milestone Date." Do you know what were just that. And they were reviewed by us and 11 SCE&G, Santee Cooper, roughly on a monthly basis. 11 that refers to? 12 12 Α Yes. Q Have you been involved with risk-based --13 risk-based construction schedules before? 13 What does that refer to? 14 No. 14 That's the difference between reset 15 Q Do you know if such a thing exists? 15 milestone date and month end milestone date. 16 I do not have firsthand knowledge of it 16 Example: Page 12, tracking number 124. 17 because I've never dealt with it. I have never been 17 If you look at the reset date is 30 June '15. Month 18 a scheduling manager or scheduler associated with 18 end milestone date, 31 October '16. There's a 19 16-month delta between those two dates. 19 risk-based scheduling. 20 20 Q And is it correct to say that there were So is that the difference between the 21 times when you rejected a mitigation strategy 21 schedule that had been in effect and the schedule 22 because your team felt that it was unlikely to be 22 that's proposed with this COD? 23 23 A Without studying this and looking at successful? 24 MR. RYAN: Object to form. 24 additional data, I can't -- I don't know the origin 25 of the reset date. THE WITNESS: We, scheduling, didn't have

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#### Terry Elam Page 83 Page 85 Q Sure. And if you could turn to pages 15 1 to see if you recognize what that document is. 2 through 17 of this document, can you explain what 2 Can we have a few minutes to study this? 3 3 this chart is? Certainly. 15 through 17. Yes. 4 THE VIDEOGRAPHER: The time is 3:24 p.m., 5 5 and we are off the record. These pages are the milestones that we 6 used to track the project. Okay. It was a one-page 6 (Recess in the proceedings from 3:24 7 7 list, one for Unit 2, one for Unit 3, identical to 3:32.) 8 activities between them. And the current dates in 8 THE VIDEOGRAPHER: The time is 3:32 p.m., 9 9 the right-hand column represented the scenarios and we are back on record. 10 BY MR. COX: 10 that's called out at the top, impacted/partially 11 accelerated schedule. Those are the dates that 11 Q Mr. Elam, you have Exhibit 2 in front of 12 you. Have you -- can you identify what Exhibit 2 12 these milestones would fall on. These milestones 13 were very integral to the schedule. They have a lot 13 is? 14 A Yes. Exhibit 2 is the culmination of all 14 of meaning. Okay. 15 15 the work that was done while we were sequestered Page 16, the same scenario, but the 16 accelerated dates as described in the previous 16 doing this intense schedule review. 17 earlier part of the document. 17 Q So this was -- this PowerPoint was 18 Page 18 -- 17. Excuse me -- are the ones 18 completed after the review period was done with for the Unit 3, which we only have the one scenario 19 SCE&G and Santee Cooper? 20 for Unit 3. 20 Right. This is the -- this is the final 21 Q And the last event is substantial 21 documentation that wrapped all of that up and was 22 completion of the unit; is that right? 22 presented to SCE&G, Santee Cooper management, our 23 23 CB&I management, Westinghouse. I don't know if That's correct. 24 Q And the first action is approval of the 24 there was anybody else there or not. I don't think 25 COL? 25 so. Page 84 Page 86 Q And there's a slide that's labeled page 2, 1 Restate. I didn't understand. 2 called "Path Forward." Can you describe what that The first key date for each unit was the approval of the COL license? shows? The command operating license, that is A Yes. That was the plan of the plan for us correct. to do all that work. That's what this was, page 2. Those are all the questions I have on that 6 Q And to your knowledge, was this schedule 7 document, Mr. Elam. 7 met, actually performed? 8 Yes. Α 9 (E-mail correspondence dated 8/25/14, So is it fair to say that by the end of

21

23

24

Page: 26 (83 - 86)

Q

22 Exhibit 1.

8 --9 (E-mail correspondence dated 8/25/14,
10 with attached V.C. Summer Integrated
11 Project Schedule Review & Validation,
12 SCANA\_RP0692496-692508, marked Elam
13 Exhibit Number 2 for identification.)

15 DV MD COV.

15 BY MR. COX:

14

Q I'm going to hand you a document labeled
Exhibit 2 (handing). Exhibit 2 is a document that's
Bates numbered SCANA\_RP0692496 through
SCANA\_RP0692508.
It's an e-mail with an attached PDF file.

The original e-mail went from Aaron Tibbetts to several people, including yourself, Mr. Elam, on August 25th, 2014.

And I wanted to ask you about the attachment, the PowerPoint attachment to the e-mail,

10 August, the schedule review had been -- August 2014, 11 the schedule review was completed? 12 This part of the review was complete, yes. 13 And what is "this part"? 14 Meaning that we had -- we had the schedule 15 information that would be proposed for at least a retargeting of the schedule for -- for a new 16 17 substantial completion. 18 The next page in the exhibit, page 3, is 19 labeled "IPS History." 20 Yes.

This is the same slide that was in

Okay. Can you explain how it's different?

The scenarios are a little different from

Similar, not the same.

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- 1 what was in the presentation from August the 1st in
- 2 the fact that it doesn't have the original baseline
- 3 on it. It starts with -- with the settlement
- 4 agreement under change order 16. Then there's an
- 5 additional line next where we worked on a different
- 6 substantial completion for the impacts from some
- 7 modules. Okay.
- 8 And then we get into the two scenarios,
- 9 the 2014 impacted/partially accelerated, 2014
- accelerated. And then there was a 2014 additional
- 11 acceleration model that we did.
- So it's a little bit different scenarios
- 13 than what was in the Exhibit 1.
- Q In the additional acceleration, does that
- 15 include some of the potential accelerations that you
- 16 identified could be done in Exhibit 1?
- 17 A No.
- 18 Q Do you know what additional acceleration
- 19 was contemplated there?
- 20 A Specifically, no, I don't.
- 21 **Q Okay.**
- 22 A It's just been -- it's been too long ago.
- Q Were you involved in any discussions with
- 24 SCE&G or Santee Cooper about whether the schedules
- 25 that you developed would be presented to the South

### Page 88

- 1 Carolina Public Service Commission?
- 2 A Restate that again.
- 3 Q Sure.
  - Were you involved in any communications
- (5) with SCE&G or Santee Cooper regarding whether the
- 6 schedule that you developed would be presented to
- 7 the South Carolina Public Service Commission?
- 8 At this point in time?
- 9 At any point in time.
- A I mean, we -- we typically knew that if
- 11 SCE&G and Santee Cooper were going to go back to the
- 12 PSC or ORS or whatever, we would typically know
- 13 that, okay, and help produce the products that they
- 14 would need in the filings or whatever. So, I guess,
- 15 the answer is yes.
- Q So you had that --
- A Specifically here, I don't -- I don't
- 18 know.
- 19 Q Okay.
- A Because we would have to provide all the
- 21 BLRA information and stuff, the details for that.
- Q Did SCE&G ever communicate to you that a
- 23 schedule you had developed was unlikely to be
- 24 accepted by the PSC?
- A No. I don't think there would be any

### 1 reason for SCE&G to tell me that.

- Q The next page of this Exhibit 2, page 4,
- 3 can you explain what that shows?
- 4 A So page 4 has those major milestones, the
- 5 40 milestones that we looked at in the previous
- 6 Exhibit 1. And this is a table that shows the
- 7 differences in the dates between the June 2019, the
- 8 September '18 scenarios. And without studying it
- 9 more, that's about the extent of what I can tell
- 10 you.

14

22

11

13

15

- ${\tt 11} \qquad {\tt Q} \quad {\tt The\ next\ four\ pages,\ pages\ 5\ through\ 8\ of}$
- 12 the spreadsheet, are entitled, "Acceleration
- 13 Review Work Shifts."
  - Can you explain what that shows?
- 15 A So this is additional detail by building
- 16 and the various different activities of work that
- 17 needed to be performed. And if you look toward the
- 18 right-hand side of the sheet, you'll see a column
- 19 marked "Calendar."
- Are you with me?
- 21 Q Yes.
  - A Okay. So in order to -- in order to meet
- 23 that September -- if you look at the bottom of the
- 24 page, right in the middle, it's kind of hard to
- <sup>25</sup> read, but it says: "VCS Unit 2 accelerator work --

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- 1 work shift activities to support September 2018
- 2 substantial completion."
- So these are the activities that we had to
- 4 double shift on five tens, which made those five
- 5 days a week, 20 hours a day. Those are the
- 6 activities -- to be able to bring that schedule back
- 7 from December to September, these are the activities
- 8 that we would have had to put on at least two
- 9 shifts, okay, to make the scenario work out for a
- 10 September completion.
  - Q And the next two pages --
- 12 A Which? As in page?
  - Q -- page 9 and 10, that's entitled,
- 14 "Acceleration Review Shield Panels."
  - Can you describe what that is?
- 16 A These are the dates that we would have
- 17 needed shield panel deliveries by to be able to meet
- 18 the September of '18 substantial completion date.
- 19 So this is additional mitigation that would have
- 20 been needed to be able to meet that date.
- Q And one last issue on Exhibit 2, Mr. Elam.
- 22 If you turn back to page 3, the IPS History chart,
- 23 there's one line there entitled, "2013 April Module
- 24 Summit Meeting Delivery Schedule. Mitigation
- 25 Performed to Keep Substantial Completion in 2017."

#### Page 91 Page 93 Is that a schedule that your group Q Would that include the time period when -prepared at some point in time? 2 between January and August 2014, when your team was revising the schedule? Yes. Was it prepared in or about April of 2013? A I don't have the documentation in front of 5 I can't recall. There's not enough info 5 me to verify that. 6 here for me to make that call. 6 The first page --7 7 And I don't remember. Q But it's fair to say that it was a Okay. No. That's fine. schedule that was performed before the schedule you 8 9 The first page, I'd like for you to did in August 2014, correct? 10 explain one term. I think you discussed it earlier, 10 A Yes. I mean -- yes. 11 11 but it says, quote: "The attached files correspond 12 12 to a forecasted Unit 2 substantial completion date (Letter to Ronald A. Jones, from 13 Carl Churchman, dated 8/7/15, 13 of September 28, 2019. This is 101 days negative 14 WEC\_SCORS\_000001-4, marked Elam 14 float to the June 2019 target substantial 15 completion," end quote. Exhibit Number 3 for identification.) 15 16 16 Can you explain what those sentences mean? 17 A That means that the current schedule that 17 BY MR. COX: 18 Q Mr. Elam, Exhibit 3 is a document that was 18 we were providing them was 101 days later than 19 produced by your attorneys in this action or -- I'm June 2019 for the substantial completion of Unit 2. So if you -- if you take a calendar and sorry -- Westinghouse's attorneys in this action. 20 21 And it appears -- well, I was wondering if you could 21 you go June of 19, add three months to it plus a few 22 days, you're about there. So it would have been 22 describe for me what this document is. 23 Okay. I've looked at the document. 23 September something. 24 24 Can you explain what it is? Q Those are all the questions I have on 25 25 Exhibit 3, Mr. Elam. This looks like one of our month-end Page 92 Page 94 1 letters, transmittals to the client for -- for data I wanted to turn to a different topic now. 2 the end of July 2015. 2 It's in relation to an assessment that was performed Q And was this done every month when you 3 on the project by the Bechtel Corporation. were on the project? Did you become aware, during your time Yes. working on the project, that Bechtel was performing How was the schedule -- what format was an assessment of the project? the schedule in when you provided it to SCE&G? A Yes. A This -- well, there was -- there was When did you become aware of that? numerous reports provided, okay, as you can see from I don't know the month, year. Well, I 10 sheet 4, the last sheet. Okay. There's a list of 10 know the year's got to be probably 2015. I don't 11 documents in PDF form that was supplied. 11 know what month. 12 How did you become aware of it? Also, it states that enclosed is a CD. 13 Okay. On that CD was these documents. And in I was requested to meet face to face with addition to that, there was a Primavera XER file. 14 (the Bechtel individuals, and -- and eventually provide -- provide information to them. 15 That's the native format that Primavera -- Primavera 16 data is exported in so that somebody else could take Q Do you recall who you met with from the 17 the data and reload it on another Primavera machine 17 Bechtel Corporation? 18 and review it. A I can't remember names, but I do remember 19 19 that it was their project controls manager that was Q And was that electronic format of the 20 schedule provided to SCE&G during your entire time 20 there doing the schedule evaluation, and some of 21 on the project? 21 (their construction individuals. Whether they were 22 A Yes, it was, with the exception of periods 22 superintendents or, you know, construction managers, 23 that we elected not to send a schedule to them I don't remember. Q Did they interview you all at once or was 24 because we were working in conjunction with them to

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25 either retarget or rebaseline.

it separate interviews with each of them?

Terry Elam				
Page 95	Page 97			
1 A Separate interviews. They're, you know	1 Q At the time that Bechtel was performing			
2 when you say "all at once," are you talking about	2 this assessment, were you aware that Bechtel was			
(3) interviewing all the CB&I people all at once or was	3 assessing the schedule for the project?			
(4) (all the Bechtel people there at the same time?)	4 A Yes.			
5 Q That was vague.	5 Q How did you become aware of that?			
6 How many times were you interviewed?	6 A Through the information they were seeking.			
(7) (A) (I don't have an exact number. Several. I	7 Q Did they ever tell you they were assessing			
8 mean, we were interactive with them the whole time				
(they were on-site. I just don't remember how long)	9 A (I don't remember specifically.)			
(10) they were on-site, so	Q But from their request, it was clear to			
(11) Q When you say "interactive," what kind of	11 you that they were assessing the schedule?			
(12) interactions was occurring between your group and	12 A Absolutely.			
13 Bechtel?	Q Did you ever receive a copy of Bechtel's			
(14) A (Providing schedule information or just	14 written schedule assessment?			
15 (answering questions from their project controls)	15 A Never.			
16 group or from their construction group.	Q Have you seen it as of now?			
Q Was there any information they asked for	17 A Only when it became a public document.			
18 (that you weren't able to provide them?)	18 Q Do you know why you were not given access			
(19) (A) (None.)	to the Bechtel schedule assessment when you were on			
(20) (Q) (The interviews that you had with Bechtel,	20 (the project?)			
were you the only one being interviewed or were	MR. RYAN: Object to form.			
other folks from the consortium also being	(THE WITNESS: I do not.)			
(23) (interviewed?)	23 BY MR. COX:			
(24) A Others. Aaron Tibbetts from my group, he	24 Q Are you disappointed that you were not			
and I represented the schedule piece. Lisa Cazalet	25 given Bechtel's schedule assessment at the time you			
Page 96	Page 98			
Page 96	Page 98			
1 represented the cost and the risk side.	1 were on the project?			
<ul> <li>represented the cost and the risk side.</li> <li>Q Did you take any notes during these</li> </ul>	<ul><li>were on the project?</li><li>MR. RYAN: Object to form.</li></ul>			
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	Page 99		Page 101
1	comment.	1	THE WITNESS: Restate.
2	BY MR. COX:	2	BY MR. COX:
3	Q Were you aware that at a certain point in	3	Q Sure.
4	time, Westinghouse entered into an amendment to the	4	Was there a certain point in time on the
5	EPC contract that is commonly called the fixed price	5	project, with respect to the last schedule you had
6	option?		on the project, so let's back up a bit.
7	A State your question again.	7	Do you recall what the last schedule you
8	Q Sure.	8	had on the project called for with respect to
9	Did you become aware at a certain point in		substantial completion dates?
10	time that Westinghouse and SCE&G had entered into an	10	A Not exact dates, but I know that Unit 2
11	amendment to the EPC contract that was called the		specifically was not meeting the substantial
	fixed price option?		completion date on July 31st, 2017. I do not
13	MR. RYAN: Object to form.		remember specifically about Unit 3.
	THE WITNESS: That's that's outside of		
14		14	Q So you're talking about at the date of
15	my responsibilities, no.		abandonment; is that correct?
16	BY MR. COX:	16	A Yes. You asked me last.
17	Q You didn't become aware of that?	17	Q Right. And well, that's a good
18	A At what point in time? Be more specific		starting point because my question for you is: At
19	about at what point in time.		what date did you realize that Unit 2 would not make
20	Q Well, after it happened.	20	that substantial completion date?
21	A Well, I mean, we all knew after it	21	(A) (Without being able to look at a lot more)
22	happened.	22	documentation and stuff, I can't tell you. I know
23	Q That's all my question is, if you knew it	23	it wasn't July the 31st, 2017. I know it wasn't
24	happened.	24	that date. It would have been prior to that, but I
25	A Yeah, I did know it happened after the	25	don't know specifically what date the schedule issue
	Page 100		D 102
	Page 100		Page 102
1	fact, but I didn't have leading information that it	1	did not support the substantial completion. I'd
	_		
	fact, but I didn't have leading information that it		did not support the substantial completion. I'd
2 3	fact, but I didn't have leading information that it was going to happen.	2 (3)	did not support the substantial completion. I'd have to have documentation in front of me.
2 3 4	fact, but I didn't have leading information that it was going to happen.  Q Well, it was just setting up some more	2 3 4	did not support the substantial completion. I'd have to have documentation in front of me.  Q Were there any discussions before the
2 3 4	fact, but I didn't have leading information that it was going to happen.  Q Well, it was just setting up some more questions, really. I wanted to see if you had some general awareness of an amendment being issued.	2 3 4	did not support the substantial completion. I'd have to have documentation in front of me.  Q Were there any discussions before the abandonment date of the need to do another schedule review to come up with a new completion date?
2 3 4 5 6	fact, but I didn't have leading information that it was going to happen.  Q Well, it was just setting up some more questions, really. I wanted to see if you had some general awareness of an amendment being issued.  The question I wanted to ask you is:	2 3 4 5 6	did not support the substantial completion. I'd have to have documentation in front of me.  Q Were there any discussions before the abandonment date of the need to do another schedule review to come up with a new completion date?  A With all the effort that was going on in
2 3 4 5 6	fact, but I didn't have leading information that it was going to happen.  Q Well, it was just setting up some more questions, really. I wanted to see if you had some general awareness of an amendment being issued.  The question I wanted to ask you is:  After that point in time, did you notice any	2 3 4 5 6 7	did not support the substantial completion. I'd have to have documentation in front of me.  Q Were there any discussions before the abandonment date of the need to do another schedule review to come up with a new completion date?  A With all the effort that was going on in late 2016 and 2017, we knew that there was going to
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Page 103 Page 105 1 to be met. 1 schedule. 2 MR. KEEL: Object to form. Q What is the purpose of a constraint on a 3 THE WITNESS: Let me restate that. 3 nuclear construction schedule? 4 I don't know that the substantial There's 365,000 ways to use them. There's 5 completion dates couldn't be met. 5 no one given answer. Okay. If you have a specific, 6 What I do know is that the schedule at the 6 I'll try to answer your question, but as a general 7 7 rule, there's -- there's not one -- there's not one current time was not supporting substantial 8 completion. We had not had any workshops at 8 rule for why you would use one. 9 that point to look for any kind of additional What's the most common reason that you would constrain an activity on a nuclear 10 mitigation efforts to recover the schedule at 11 that point in July of '17. 11 construction schedule? 12 BY MR. COX: A Again, I -- there is no one clear-cut 13 13 reason. There's thousands of reasons to want to use Q In your experience, would that have been 14 a constraint. 14 the next step to occur before resetting the dates, 15 is to look at additional mitigation efforts? 15 Does a constraint -- does a constraint 16 A Ask me the question again. 16 result in an activity having an artificial 17 17 completion in that it's being provided a date that In your experience, would that have been 18 the next step to occur before resetting the dates, 18 cannot be obtained? is to look at additional mitigation efforts? 19 Read that back. 20 20 I think that could have been one option. Let me rephrase it. 21 What were the other options that could 21 Can a constraint be used to dictate a have been taken? 22 certain event is going to occur at a certain time 22 23 A I can't think of one right now. 23 even though, in reality, there's no chance that it 24 will occur on that date? Mr. Elam, I'm going to check my notes real 25 A Yes. quick, and I think I'm almost complete. Page 106 Page 104 A Good deal. Q And why is that done? 1 1 2 2 MR. KEEL: Object to the form. Mr. Elam, have you ever worked with THE WITNESS: Without a specific, I can't 3 3 Bechtel before your interviews with them on the 4 4 V.C. Summer project? answer the question. There is -- there is 5 5 reasons, there's times that you would want to Never. Q From your experience on the project, did 6 use a constraint to control a given evolution. 7 <sup>7</sup> Fluor's involvement on the project increase the Okay. Without a specific, I can't -- I can't 8 provide any better answer than that. level of productivity? 9 9 That's not my area of expertise. It's -- if you're asking me if it's an 10 From -- from your experience or your role 10 acceptable practice or if it's commonly done, I 11 on the project, were you able to -- are you able to 11 can tell you that, yes, it is an accepted 12 12 comment on whether Fluor's involvement was practice and it is commonly done, not only in 13 beneficial to the schedule? 13 nuclear, but any other form of scheduling. Again, I don't -- I can't answer that. 14 14 Okay. 15 15 What is a schedule constraint? It can be abused, okay, but it's totally 16 A Constraint is a means by which you can 16 acceptable to use a constraint. We use 17 tell an activity, "I don't want you to start before 17 constraints in a certain way, if that's where 18 18 this given time," even though logic may say it you're -- if that's where you're headed. Okay. 19 19 could. Okay. Or you can use a constraint to tell So we had -- we had reasons. We monitored 20 an activity, "Hey, you can't finish later than constraints on a daily basis, and we knew 21 this." Okay. 21 exactly why we were using a constraint. So it's an artificial way to be able to 22 BY MR. COX: Q And would you use a constraint on the 23 dictate to the schedule the outcome of a certain string of logic or a given activity. It's a way to 24 project when you had information that showed you 25 that the constraint set -- set a date that was 25 get it to happen at a certain time in -- in the

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#### Page 107 Page 109 1 unable to be met? 1 MR. KEEL: Object to form. 2 A No, because -- some scheduling 101: THE WITNESS: Typically, no, that's not 3 Critical path, zero float. We talked about in some the way you would do it. 4 of these documents having negative float, being 101 4 BY MR. COX: 5 days late. If you didn't use a constraint, you Q How would you typically do it? 6 would not know you're late, because the constraint 6 A You would lay the -- you would lay the 7 makes that evolution go negative. That's a negative 7 schedule out. And when we talked about critical 8 101. 8 path very early in this conversation, so it's the 9 longest string of series activities from point A to If we didn't put a constraint on 10 substantial completion in that case that we alluded 10 point B. Does that meet your desired end date? Yes to a while ago in one of the exhibits, then the 11 or no? Okay. variance would always be zero because the activity Just say it came out to July, and you 13 would have moved 101 days out. Okay. But it would 13 really wanted it to be in June. Okay. So you would still be zero total float, and you would not be able 14 constrain it to June. And then you would look for 15 to distinguish that you were 101 days late unless 15 the mitigation efforts, okay, in that longest string 16 you did math to say, "Hey, my date was June. Now 16 of activities, which may be over a five-year period, 17 it's September." Okay. So there's reasons to use 17 a lot of time, to look for 30 days in that string. 18 constraints within the schedule. 18 Okay. Q So you don't want to change the date on 19 So, you know, if you -- just to give you 20 the critical path because the information you 20 an example: You're working five days a week. 21 receive will tell you whether you're negative on 21 You've got a 20 -- you've got a 20-day duration. 22 that path; is that right? 22 That's a month. Okay. I change that to six days a 23 A That's correct. 23 week. I've already gained four days out of that 24 Q On the noncritical paths, would you 24 period. Okay. 25 implement the same constraint or would you allow the 25 So -- or if I took that 20 days and put it Page 108 Page 110 1 date to fluctuate because it's not a critical path 1 to working 20 hours a day instead of 10 hours a day, 2 and it -- and it's not going to affect the 2 I'm doing 20 days' worth of work in 10 days. That's 3 what your assumption is. 3 substantial completion? A No, we would not use them necessarily on So there's a lot of ways over that three-5 other paths. 5 or four-year period of time that you're looking at Would you have some logic that would allow 6 you're 30 days late and you really want this plan 7 the constraint to take effect on a noncritical path 7 back in June. There's a lot of opportunity in four 8 to let you know when it was -- the event was so far 8 years' worth of series activities to do some 9 mitigation. 9 out of tolerance that it was becoming critical? 10 10 That's a possibility. You would never In your experience as a construction 11 have negative float if you didn't use a constraint 11 scheduler, have you ever been brought in as a third 12 party to assess the schedule that's being used on a 12 somewhere. 13 Q Do you use constraints in creating a 13 project? 14 schedule? 14 Α No. 15 Α Possibly. 15 Q And --16 Q On the project, did you ever constrain the 16 Can you -substantial completion dates? 17 Q Sure. 18 A Sure. Α Restate your question again. 18 19 19 How did you do that? Sure. 20 Put a constraint on it: Finish no later 20 So you're familiar with the fact that 21 than this date. That's how we get the negative 101 21 Bechtel came in and assessed the V.C. Summer 22 days. 22 project, correct? 23 23 Q And once you establish that constraint, Yes. 24 would you then start to build the schedule up to Have you ever, in your experience, been 25 called on to do a similar assessment? 25 that substantial completion date?

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#### Page 111 Page 113 1 Like that, no. 1 Exhibit 1. 2 And we talked a little bit about your (Witness complies with request.) And particularly, I'd like to talk about 3 background, but I didn't go into your educational 4 background. Can you explain your post-high school 4 the assumptions that are listed beginning on page 7. Okay. 5 education, if any? Yes. I went to trade school. I was an 6 Are these assumptions that you came up 7 with or were they provided to you by -- by some 7 electrical apprentice. And after I got out of other party? apprenticeship school, I was a journeyman electrician. No. This is -- the assumptions and stuff 10 And I worked my way into an electrical I&C 10 are the combination of my group, senior management type testing background. And then I become what's team, and the department managers for these issues. 12 called today, I was a planner who planned work for Okay. What about SCE&G? Would they have others to -- or craftsmen to go implement. And 13 participated in providing any of these assumptions? 14 14 then -- that was at about age 27. No, sir. 15 15 Then I became a scheduler in 1979, and Okay. The first one, Overall Project, 16 I've been doing that ever since. So '72 to '79, I 16 sounds logical enough. "Engineering, procurement, construction, and startup resources will be 17 went through an apprenticeship program, testing environment and work planning. 18 available as planned." 19 Q Do you know when your next trip to the UAE 19 What I'd like to know is: At this point 20 is scheduled? 20 in time, did you have any history or knowledge that 21 engineering, procurement, construction, resources Friday. 22 And do you know when you'll be back in the 22 had not been available when needed? 23 states? 23 No, sir, I do not. 24 24 Α Not exactly. Okay. What about the second assumption, 25 25 "Engineering assumes no additional scope of field Do you know if you're scheduled to be gone Page 112 Page 114 1 work resulting from remaining engineering due to 1 the month of November? 2 Yes. 2 regulatory changes"? Well, let me finish my 3 3 question. MR. COX: I have no further questions. 4 Thank you for your time, Mr. Elam. What -- what assurances did you have to 5 THE WITNESS: Thank you. 5 make that a reasonable assumption? What -- how did 6 MR. RYAN: Do you want a break or keep you verify that this was a reasonable assumption? 7 MR. RYAN: Object to form. going? 8 THE WITNESS: Let's go. 8 MR. KEEL: Same. 9 MR. RYAN: Take a break? 9 THE WITNESS: I didn't. 10 THE WITNESS: No. Let's roll. 10 BY MR. EVANS: 11 MR. RYAN: Okay. Your show. 11 Q Okay. And had you had, at this point in 12 THE WITNESS: I may in five minutes, but 12 time, any historical knowledge that there had been 13 right now I'm good. problems resulting from regulatory changes? 14 MR. RYAN: All right. Sure. 14 Sure. MR. RYAN: Object to form. 15 15 16 **EXAMINATION** 16 BY MR. EVANS: 17 17 Q And that had impacted the schedule? 18 BY MR. EVANS: 18 And under "Licensing," the second one that 19 Q Mr. Elam, my name is Jerry Evans, and I 19 represent the ratepayers in the state court action. 20 says: "The owner, SCE&G, will incorporate necessary 20 21 And as you just referenced, when you need 21 licensing changes in a manner that does not delay 22 a break, let me know, and we will certainly 22 the IPS." 23 accommodate you. And I will try and be as efficient 23 First of all, what is IPS? 24 as I can. 24 Integrated project schedule. 25 I'd like you to direct your attention to Again, did you do anything to -- to verify

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## Page 115

- 1 the reasonableness of this assumption?
- 2 MR. RYAN: Object to form.
- 3 THE WITNESS: After the presentation, we
- 4 identified the areas of concern that SCE&G
- 5 would need to work on.
- 6 BY MR. EVANS:
- 7 Q Okay. And were you at this appointed time
- 8 aware that there had been licensing changes that did
- 9 affect the schedule?
- 10 A Was I aware of, at this time --
- 11 Q Yes.
- 12 A -- there had been licensing changes made
- 13 to support the schedule?
- 14 Q That impacted the schedule.
- 15 A I would say yes, or we wouldn't have
- 16 written this line item in here.
- 17 Q Okay. So --
- 18 A Okay.
- 9 Q -- the fact that it's listed as an
- 20 assumption means this is something we should have
- 21 some concern about?
- 22 A When we were doing these scenarios, I'm
- 23 pretty sure, the way this reads, that we ran into
- 24 issues with the SCE&G activities associated with
- licensing. And we made changes to say, "Here's what

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- 1 you have to do in order to support this schedule."
- 2 Does that make sense?
- 3 Q It does. Thank you.
- And just one more thing on this exhibit.
- 5 If you'd turn to pages 11 and 12, the BLRA Milestone
- 6 Tracking.
  - A (Witness complies with request.)
- Q You explained earlier what the delta
- 9 months meant, you know, that the extent to which a
- 10 project was negative to the reset milestone date,
- 11 correct?
- 12 A Yes, sir.
- Q Okay. And BLRA milestones were presented
- 14 in monthly reports, correct?
- 15 A Yes, sir.
- Q And I've seen those. And depending on the
- 17 milestone, in some cases the delta months increases
- 18 over time, correct?
- 19 A Yes, sir.
- Q That delta number can increase, and that
- $21\,$  will show up on the schedule, but that wouldn't --
- 22 it can increase and increase, but that itself would
- $^{23}\,$  not change the substantial completion date. Am I
- 24 correct?
- 25 A Not true.

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- Q Not true. Explain to me how that could or could not.
- A Depending on whether one of these BLRA
- 4 milestones is in the critical path, okay, and its
- variance -- depending on whether one of these BLRA
- 6 milestones don't have enough float --
- 7 Q Okay.
- 8 A -- okay, and the variance becomes greater
- 9 than the amount of float that the activity had, it
- 10 could impact substantial completion.
- 11 It's kind of a complicated answer I gave
- 12 you if you don't really understand the schedule.
- 13 But, you know, if -- if the Base Load Review Act has
- 14 60 -- has 20 days of float on it, and the variance
- 15 to where it was originally set is greater than that,
- 16 then it's beginning to impact something. It doesn't
- 17 mean it's beginning to impact critical path, but
- 18 it's having a downstream effect on something.
- And whatever it's impacting, if it were to
- 20 only have 10 days of float, and we continued to not
- 21 meet the date, and the variance got bigger and
- 22 bigger and bigger, then it would eat that 10 days of
- 23 float up and start impacting the next activity
- 24 downstream, which could be critical path or some
- 25 other path leading into critical path.

#### e 116 |

- 1 Q And at what point do you say to the
  - 2 owners, "We have a problem. We now cannot meet the
  - 3 scheduled operational date"?
    - A As soon as it's identified --
  - Q Okay.
  - 6 A -- you know. And, you know, the criteria
  - $7\,$  for the BLRAs was plus 18 months. So we had
  - 8 specific watches on anything that was 10 or greater.
  - 9 So we had discussions, you know, the client with us
  - 10 and us with the client, about those -- about those
  - 11 BLRA milestones.
  - Q And prior to this schedule reevaluation in
  - 13 mid 2014, what is the prior time that there had been
  - 14 an adjustment to the substantial completion date?
  - 15 A You know, without -- without some
  - $\,$  16  $\,$  documentation, I can't answer. You know, it's
  - 17 just -- it's been -- there was a few of those and
  - 18 too long ago for me to remember.
  - 19 Q Just one more question on this document.
  - The last column of this chart, it says,
  - 21 "Internal Notes." And I just wanted to ask you
  - 22 about one of them. The second notation in that
  - column on page 11, "There was a delay due toschedule refinement and schedule resequencing."
  - 25 I just wanted you to explain to me what

	Terry Elam				
	Page 119		Page 121		
1	that meant. How would that cause a delay?	1	marked has the starting Bates number		
2	A You know, that that specific one is a	1	SCANA RP0422865.		
3	Westinghouse item.	3	MR. EVANS: And I'm directing the witness'		
4	Q Okay.	4	attention to the second to last page, which		
5	A And I do not have the answer for that.	5	ends in Bates 877.		
6	Q And this appears on the schedule based on		BY MR. EVANS:		
7		7	Q Sir, this is a pie chart that's labeled,		
	to you?	8	"Schedule Adherence Reasons." Can you tell me what		
9	,		is being depicted in this chart?		
	<b>9</b>				
1	that Westinghouse proper took care of, like	10	A So this schedule adherence, we monitored		
11	equipment and stuff, and that's what that is,		on a weekly basis the number of activities that were		
	refueling machine. And that would have been between	12	,		
	them and the vendor that was manufacturing that	13	F /		
14	piece of equipment. And I'm I just I don't	14	And this pie chart represents in		
15		15	percentage form the reason either an activity did		
16	Q You used the term earlier that you had a	16	not start or did not finish. So we were trying to		
17	deterministic schedule rather than a risk-based	17	get our hands around and trend what what are the		
18	schedule. Do you recall that?	18	most relevant issues for us not being able to start		
19	A Yes, sir.	19	or complete an activity within a seven-day window.		
20	Q So is it the case that you did not build	20	Q Would this chart apply to a one-week		
21	contingencies into your schedule?	21	period or is it cumulative?		
22	A We did not.	22	A This is week ending, so it would be it		
23	Q Was there any way to look at your schedule	23	would be on a weekly basis.		
24	and identify potential float?	24	Q Okay. And there are some descriptions		
25	A Your word "any" is really big. It's kind	25	here, "Design, Material, Inadequate Schedule,"		
	Page 120		Page 122		
1	of like "all."	1	things like that. But the largest one, 50 percent,		
2	Possibly. I mean	1	is called "Institutional Delay." What does that		
3	Q But your schedule was designed to show	1	mean?		
4		4	A I can't answer that. It's been it's		
	an accurate thing to say?	5	been too long.		
6	A It was actual float, yes.	6	Q Wow. Because that was fully half the		
7	Q Let me show you an exhibit.		delays in that week.		
8	Q Let the show you an exhibit.	8	A Yes. I just can't answer.		
9	(Construction Performance Meeting, WE	9			
10	12/28/14, SCANA_RP0422865-422878, marked	10	Q Okay.  A Other than, if you look at the other ones,		
11	Elam Exhibit Number 4 for identification.)	1	they are pretty good reasons. Okay.		
12	DV MD EVANC.	12	Q The other reasons are sort of		
	BY MR. EVANS:		self-defining.		
14	Q And if you want to take a minute to look	14	A Right. So, I mean, you're getting the		
15	at that, I will tell you that the only question I'm	15	3		
16	going to ask you about is on the pie chart, the	16	Q Okay.		
17	second to the last page.	17	A I used to ask my guys, "What does that		
18	A (Witness complies with request.) Okay.	18	mean?"		
19	Q Is this a document that you're familiar	19	Q Who would be the best person to tell me		
20	with?	20	about construction delays in this chart? Who would		
21	A Yes.	21	be the best person?		
22	Q Did you participate in construction and	22	A Honestly, me; and I don't know.		
23	performance meetings?	23	Q Okay. Well, I appreciate your honesty,		
24	A Yes.	24	sir.		
25	Q Okay. This the exhibit we've just	25	On Exhibit 2, on page 5 of that		

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3

10

Page 123

- 1 "Acceleration Review Work Shifts," do you see
  2 that?
- 3 A Yes, sir.
- Q You explained the data under the column
  Calendar," in terms of applying hours a day and the
  days and the work shifts.
- 7 Is this the type of workforce data that --8 that had traditionally been included in your 9 schedule?
- A Yes. The -- looking at the schedule
  proper, you know, this -- this information is -- is
  there for -- for anybody to review. You can look at
  any one activity and -- in the schedule and see its
  related calendar for work shifts.
- Q And was this -- were you getting data from the various departments on their actual labor force when you were doing these estimates?
- A When we were doing these scenarios, we
  were telling them what -- we were telling
  construction management, "Here's what you're going
  to have to do to be able to meet these dates."
- So in this schedule workshop, okay, we
  were developing the models that said, "Okay. Here's
  what we've done to be able to meet this date. Like
  this is all centered around that September date.

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- 1 And specifically, between December of '18 and
- 2 September of '18, what did we have to do to be able
- 3 to pick up that three months?"
- So that's specifically why this page is in there that, hey, you know, out of, you know, this
- 6 is -- there's 58, 77, 100 -- 142 activities out of
- 7 20,000 that we had to increase the working hours on
- 8 to be able to move the schedule end date from
- ${\tt 9}\,$  December to September. That's specifically why.
- 10 They wanted to specifically be able to see what the
- 11 mitigation efforts were that we did to pick up that
- 12 three months.
- Q And do you know if these workforce requirements were met?
- A Well, we didn't use that scenario. We did not use the September scenario as an actual scenario. We went back, I believe, with the
- 18 December of '18 established schedule.
- Q Okay. And did that include work -similar workforce requirements that would be listed
  on a chart?
- A Sure. I mean, there were -- there were
  other activities, even to meet December, that we had
- 24 to work double shifts on to be able to try and
- 25 maintain the schedule.

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- Q And as far as you know, were those requirements for workforce met?
  - A As far as I know, yes.
- You know, that's -- let me reclarify that,
- 5 because that's not in my purview. I don't know the 6 answer to that
  - answer to that.
- Q Were you, in general, aware of anyproblems of worker shortages?
- 9 MR. KEEL: Object to form.
  - THE WITNESS: Still, again, that's
- 11 construction management.
- 12 All I can say is, hey, either you got to,
- you know -- I mean, the schedule is a model,
- and the duration for a given activity is X. If
- they can get to activity X in that duration
- with two men -- that goes back to your PF
- comment -- you know, it doesn't really matter
- to me scheduling how you get there. I just
- want you to hit that date, because if you can
- 20 hit that date, it doesn't impact something
  - else.

21

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- 22 BY MR. EVANS:
- $\,$  Q You mentioned at the time that
- 24 Westinghouse took over part of CB&I, you then became
- 25 an employee of Westinghouse, correct?

Page 126

- 1 A That's correct.
- Q Did your team that had been with you when
- 3 you were a CB&I employee, did they come with you to
- Westinghouse?
- A Yes, sir. We had very little pertubation
- 6 over the eight or nine years with the schedule team.
- 7 Q And you also mentioned that in coming up
- $\ensuremath{\mathtt{8}}$  with the integrated project's schedule, there was a
- 9 Westinghouse portion and a CB&I portion. Is that
- 10 correctly your testimony?
- 11 A In the early days, okay, there was
- 12 Westinghouse engineering, procurement, licensing;
- there was CB&I engineering, procurement. Okay.
- 14 Then there was -- did I say that right?
- 15 There was Westinghouse engineering, procurement.
- 16 There was Shaw engineering, procurement,
- 17 construction, commissioning.
- And then it began -- then Shaw to CB&I,
- 19 the transition from Shaw to CB&I; and then from CB&I
- 20 to Westinghouse/WECTEC. Some people went to
- 21 Westinghouse, some people went to WECTEC.
- 22 Q Okay. Was anyone from SCE&G -- did they
- 23 have a role in the day-to-day schedule making?
- 24 A No. However, we did have some SCE&G

1611	Elam	
Page 127		Page 129
1 reviewed a few minutes ago, okay, which were, you	1	we are off the record.
2 know, Westinghouse prepares it. Okay. They send	2	(Recess in the proceedings from 4:47
3 the transmittal to the to SCE&G. And then SCE&G	3	to 4:54.)
4 is the only one that could submit the licensing	4	THE VIDEOGRAPHER: The time is 4:54 p.m.,
5 information to the NRC.	5	and we are back on record.
6 So we did schedule their activities for	6	
7 that, and we would consult them on where they were	7	EXAMINATION
8 with progress on their activities.	8	
9 Okay. You testified earlier that you	9 <b>B</b> Y	'MR. KEEL:
10 never felt pressured to meet a certain completion	10	Q Mr. Elam, we met shortly before your
date; is that correct?	11 de	position, but again, my name is Brandon Keel and I
12 A That's correct.	12 re	present SCE&G and SCANA in these matters. And I
Q Was there no one from SCE&G who was	13 jus	st have a few more questions for you, and then
(expressing to you the importance of meeting a	14 we	e'll wrap up your deposition. Okay?
completion date?	15	A Okay.
A You need to clarify at what point, or	16	Q I believe you testified in response to
17 daily or you know, I'm not sure I understand your		c. Cox's questioning that you first started on the
18 question well enough to be able to answer it.	18 VP	S project sorry V.C. Summer project in
(19) (In the times you were in meetings)	19 De	ecember of 2008; is that right?
20 discussing the schedule that included	20	A That's correct.
21 representatives from SCE&G and certainly there	21	Q And when did you finish working on that
were those meetings, yes?	22 pr	oject?
A Yes.	23	A I finished working on the project 7/31 of
Q Was anyone from SCE&G expressing any	24 20	17, and ceased employment with WECTEC on 8/31.
opinion at all on the importance of meeting the	25	Q Throughout your time working on the
Page 128		Page 130
1 completion dates?	1 pr	oject at V.C. Summer, is it fair to say that you
2 A I think the question is a little vague, so	2 alv	ways performed your responsibilities to the best
3 I don't know exactly how to answer it.	3 of	your ability?
There was certainly always SCE&G people	4	A That's correct.
5 available or in schedule review meetings. They had	5	Q Is it fair to say that throughout your
6 their comments. You know, they made us go back to	6 tin	ne working on the project, that whenever you
7 the board and look for mitigations at certain	7 co	mmunicated information about the project, you did
8 points.	8 <mark>so</mark>	honestly?
9 You know, if your question is along the	9	A (I did.)
lines, "Did they just not care?" the answer is no.	10	Q (And your primary responsibility for the
We had a lot of interaction back and forth.		oject was scheduling?
Q Was there any point, prior to the	12	A That's correct.
abandonment of the project, that you considered the	13	Q Is it fair to say that whenever you
challenges of meeting the schedule to be such that		ovided information regarding the schedule of
the project would not be completed?		the project, you believed it to be accurate?
16 A No, sir.	16	A Yes.
Q Did you ever hear that view expressed by	17	Q Okay. Is it fair to say that whenever you
18 anyone from SCE&G?		ovided a schedule for the project, that you
19 A No, sir, I did not.		lieve it reflected the best available information?
20 MR. EVANS: Thank you. That's all the	20	A Yes.
21 questions I have.	21	Q And you've already testified, I believe,
22 THE WITNESS: Thank you, sir.		response to Mr. Cox's questioning, that at the
Can we take five?		ne you proposed any schedule for the project, you
24 MR. KEEL: Absolutely.	24 be	lieved it was achievable?
25 THE VIDEOGRAPHER: The time is 4:47, and	25	A That's correct.

## Page 131 Page 133 Q And to the extent that there were delays 1 certain items --2 along the way on the project, the consortium was 2 That came from me, to the manager. 3 putting in place various mitigation strategies that And just for the record, you may know 4 were believed to be sufficient to meet the projected 4 where I'm going with my questions. Just let me 5 completion dates; is that fair? 5 finish so only one of us is talking at a time. I'd That's correct. 6 appreciate it. 7 7 And I want to talk a little bit more about And were there particular individuals 8 the scope of the work that goes into developing a outside of the scheduling team who were primarily 9 project of this nature. responsible for providing the scheduling team 10 I believe you testified in response to information to update the schedule? 11 11 Mr. Cox's questioning that you have basically been So restate your question one more time. doing scheduling for major construction projects for 12 Sure. 13 the last 39 years; is that right? 13 So outside of the employees working 14 directly for you, were there particular individuals 14 A Without doing the math, I'll take your word for it. That would be close anyway. 15 at different parts of the organizations who had that Q Since 1979? 16 responsibility for updating the schedule? 17 A Right. 17 A Yes. 18 Q Do you know how many different individuals Okay. And on this particular project, you 18 19 testified that you had your own team of schedulers 19 were involved in that process? 20 20 that varied over the course of the project, but No, I do not. 21 ended with roughly 30 employees working underneath 21 Q Do you know how many different, let's say, you; is that right? departments were involved in that process? 22 23 Approximately, yeah. Not specifically. And it's not Q And they were working full-time on 24 necessarily departments, because the schedule was --25 scheduling issues? 25 the architecture of the schedule was --Page 132 Page 134 That's correct. 1 construction-wise was by building. Okay. So you 1 2 Q 2 had a lot of different construction superintendents, Okay. In addition to your team of 3 general foremens, that worked with the individual 3 employees, I took it from your prior testimony that 4 there were individuals within the different 4 schedulers in their given area to support that. 5 departments on the project that were providing you 5 Then, yes, you did have other departments. 6 information for scheduling. Is that right? 6 You had -- you had another organization for A When you say me, just clarify that. They procurement. You know, we've been through this; the 8 were providing schedule updates, maintenance, 8 engineerings, the licensing, so -- the commissioning 9 people. So I don't have a specific number, but a 9 modifications to the schedule. I only own the 10 schedule data itself. 10 lot of people. 11 So just to try to clarify, they didn't --11 Okay. Is it fair to say that, outside of 12 the 30 employees working on your team, that dozens 12 they didn't get information and come directly to me 13 and then go put it in the schedule. The information of other people were involved in scheduling? 14 they obtained from the organizations they're Let me be sure I understand your question. 15 So besides the 30 that worked to me, there was --15 supporting went into the schedule, it was analyzed 16 and vetted, and either it was okay or it was an you used the word "dozen"? Were there dozens of other people who were 17 issue. If it was an issue, the concerns got raised 18 involved in the process of providing information to 18 and passed on to whomever to get a resolution to 19 whatever the issue was. 19 update the schedule? 20 20 A The construction schedule? Q Sure. I don't mean to you specifically. 21 But your team was responsible for the schedule 21 The overall schedule. 22 itself? 22 Many, because there was -- there was many 23 different facets to the schedule. Okay. Α Yes. We were controlling over 300,000 24 But the substantive information about activities. Okay. So there's many, many people, 25 where the status of the project was in comparison to

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_		<u> </u>	,	iaiii
		Page 135		Page 137
1		organizations, many companies involved in the	1	Exhibit Number 5 for identification.)
2	overall		2	
3	Q	So my dozens comment is is shooting it	3	
4	a little	too low there, is what you're saying?	4	Q Mr. Elam, I've just handed you what's been
5	A	Yes, sir.	5	marked as Exhibit Number 5 for your deposition. Do
6	Q	And the main schedule was maintained in	6	you recognize this document?
7	the Pri	mavera database; is that right?	7	Yes, I do.
8	A	Primavera.	8	Q And what do you recognize Exhibit Number 5
9	Q	Primavera.	9	to be?
10		And at the end of that at the end of	10	The BLRA milestone tracking report that we
11	the pro	oject, is it true that there were, roughly,	11	
12		00,000 activities	12	
13	A	Yes.	13	
14		maintained in that schedule?		
15	A	That is correct.	15	
16	Q	Do you know how that number varied over	16	
17		rom 2008 to 2017?	17	
18	A	I know some of it. I don't know all of	18	
19		I Know some of it. I don't know all of	19	·
		Davidhly ware there several hundred		Q ona, rina anon ano rinnaro a aoarri, 12
20	Q	Roughly, were there several hundred	20	modification of the control of the c
21		and or over 100,000 activities reflected in the	21	
		ule for years prior to the end of the project?	22	// /// // // // // // // // // // // //
23		Your question was: Was there 100,000	23	op, -
	activiti	es or so prior to	24	Q onay. Then you have a accompany or and
25	Q	Years prior to the end of the project.	25	activity. And then the reset milestone date, as of
		Page 136		Page 138
1	Α	Yes.	1	Page 138 September 1, 2015, that would be a reference to the
1 2	A Q	_	1	
	Q	Yes.	1	September 1, 2015, that would be a reference to the active schedule; is that right?
2	Q is it tru	Yes.  And in addition to the Primavera database,	2	September 1, 2015, that would be a reference to the active schedule; is that right?
2 3 4	Q is it tru providi	Yes.  And in addition to the Primavera database, ue that you were also responsible for	2 3 4	September 1, 2015, that would be a reference to the active schedule; is that right?  A That would have the column that says
2 3 4	Q is it true providi looked	Yes.  And in addition to the Primavera database, ue that you were also responsible for ing the updated BLRA milestone reports that we	2 3 4 5	September 1, 2015, that would be a reference to the active schedule; is that right?  A That would have the column that says  "Reset Milestone Date as of September 1st, 2015"
2 3 4 5 6	Q is it tru providi looked	Yes.  (And in addition to the Primavera database, ue that you were also responsible for ing the updated BLRA milestone reports that we at earlier?)	2 3 4 5 6	September 1, 2015, that would be a reference to the active schedule; is that right?  A That would have the column that says  "Reset Milestone Date as of September 1st, 2015"  would be the last would be the date that, for the
2 3 4 5 6	Q is it tru providi looked A BLRA r	Yes.  And in addition to the Primavera database, ue that you were also responsible for ing the updated BLRA milestone reports that we at earlier?  I was responsible for the construction	2 3 4 5 6	September 1, 2015, that would be a reference to the active schedule; is that right?  A That would have the column that says "Reset Milestone Date as of September 1st, 2015" would be the last would be the date that, for the ones not complete, would have been rebaselined and approved by the ORS, PSC.
2 3 4 5 6 7	is it true providi looked A BLRA r	Yes.  And in addition to the Primavera database, ue that you were also responsible for ing the updated BLRA milestone reports that we at earlier?  I was responsible for the construction milestones. Westinghouse was responsible for	2 3 4 5 6 7	September 1, 2015, that would be a reference to the active schedule; is that right?  A That would have the column that says "Reset Milestone Date as of September 1st, 2015" would be the last would be the date that, for the ones not complete, would have been rebaselined and approved by the ORS, PSC.  Q That's for the incomplete ones, that
2 3 4 5 6 7 8	is it tru providi looked A BLRA r the oth	Yes.  (And in addition to the Primavera database, ue that you were also responsible for ing the updated BLRA milestone reports that we at earlier?  (I was responsible for the construction milestones. Westinghouse was responsible for the rones, which consisted mainly of either a	2 3 4 5 6 7 8	September 1, 2015, that would be a reference to the active schedule; is that right?  A That would have the column that says "Reset Milestone Date as of September 1st, 2015" would be the last would be the date that, for the ones not complete, would have been rebaselined and approved by the ORS, PSC.  Q That's for the incomplete ones, that references the most recent approved date for the
2 3 4 5 6 7 8	is it tru providi looked A BLRA r the oth	Yes.  (And in addition to the Primavera database, ue that you were also responsible for ing the updated BLRA milestone reports that we at earlier?  (I was responsible for the construction milestones. Westinghouse was responsible for her ones, which consisted mainly of either and issue or a licensing activity or a	2 3 4 5 6 7 8	September 1, 2015, that would be a reference to the active schedule; is that right?  A That would have the column that says "Reset Milestone Date as of September 1st, 2015" would be the last would be the date that, for the ones not complete, would have been rebaselined and approved by the ORS, PSC.  Q That's for the incomplete ones, that references the most recent approved date for the protected items is your understanding?
2 3 4 5 6 7 8 9	Q is it tru providi looked A BLRA r the oth licensii procur	Yes.  And in addition to the Primavera database, ue that you were also responsible for ing the updated BLRA milestone reports that we at earlier?  I was responsible for the construction milestones. Westinghouse was responsible for her ones, which consisted mainly of either a ng issue or a licensing activity or a ement.	2 3 4 5 6 7 8 9	September 1, 2015, that would be a reference to the active schedule; is that right?  A That would have the column that says "Reset Milestone Date as of September 1st, 2015" would be the last would be the date that, for the ones not complete, would have been rebaselined and approved by the ORS, PSC.  Q That's for the incomplete ones, that references the most recent approved date for the protected items is your understanding?  A Most recent, I'm not sure about.
2 3 4 5 6 7 8 9	Q is it true providi looked A BLRA r the oth licensii procur. Q your b	Yes.  (And in addition to the Primavera database, ue that you were also responsible for ing the updated BLRA milestone reports that we at earlier?  (I was responsible for the construction milestones. Westinghouse was responsible for her ones, which consisted mainly of either a ng issue or a licensing activity or a ement.  (Is it fair to state that you always made)	2 3 4 5 6 7 8 9 10	September 1, 2015, that would be a reference to the active schedule; is that right?  A That would have the column that says "Reset Milestone Date as of September 1st, 2015" would be the last would be the date that, for the ones not complete, would have been rebaselined and approved by the ORS, PSC.  Q That's for the incomplete ones, that references the most recent approved date for the protected items is your understanding?  A Most recent, I'm not sure about.  Q Okay.
2 3 4 5 6 7 8 9 10 11	Q is it tru providi looked A BLRA r the oth licensir procur. Q your b milesto	Yes.  And in addition to the Primavera database, ue that you were also responsible for ing the updated BLRA milestone reports that we at earlier?  I was responsible for the construction milestones. Westinghouse was responsible for her ones, which consisted mainly of either a ng issue or a licensing activity or a mement.  Is it fair to state that you always made est effort to ensure that the updated one schedules you provided to the owners	2 3 4 5 6 7 8 9 10 11 12	September 1, 2015, that would be a reference to the active schedule; is that right?  A That would have the column that says "Reset Milestone Date as of September 1st, 2015" would be the last would be the date that, for the ones not complete, would have been rebaselined and approved by the ORS, PSC.  Q That's for the incomplete ones, that references the most recent approved date for the protected items is your understanding?  A Most recent, I'm not sure about. Q Okay. A I don't remember the last time that we
2 3 4 5 6 7 8 9 10 11 12 13	Q is it tru providi looked A BLRA r the oth licensii procur Q your b milesto reflect.	Yes.  (And in addition to the Primavera database, ue that you were also responsible for ing the updated BLRA milestone reports that we at earlier?  (I was responsible for the construction milestones. Westinghouse was responsible for her ones, which consisted mainly of either ang issue or a licensing activity or a lement.  (Is it fair to state that you always made lest effort to ensure that the updated one schedules you provided to the owners led the most current information concerning	2 3 4 5 6 7 8 9 10 11 12 13	September 1, 2015, that would be a reference to the active schedule; is that right?  A That would have the column that says "Reset Milestone Date as of September 1st, 2015" would be the last would be the date that, for the ones not complete, would have been rebaselined and approved by the ORS, PSC.  Q That's for the incomplete ones, that references the most recent approved date for the protected items is your understanding?  A Most recent, I'm not sure about. Q Okay. A I don't remember the last time that we went through a reset.
2 3 4 5 6 7 8 9 10 11 12 13	Q is it tru providi looked A BLRA r the oth licensii procur Q your b milesto reflect.	Yes.  And in addition to the Primavera database, ue that you were also responsible for ing the updated BLRA milestone reports that we at earlier?  I was responsible for the construction milestones. Westinghouse was responsible for her ones, which consisted mainly of either a ng issue or a licensing activity or a mement.  Is it fair to state that you always made est effort to ensure that the updated one schedules you provided to the owners	2 3 4 5 6 7 8 9 10 11 12 13 14	September 1, 2015, that would be a reference to the active schedule; is that right?  A That would have the column that says "Reset Milestone Date as of September 1st, 2015" would be the last would be the date that, for the ones not complete, would have been rebaselined and approved by the ORS, PSC.  Q That's for the incomplete ones, that references the most recent approved date for the protected items is your understanding?  A Most recent, I'm not sure about.  Q Okay.  A I don't remember the last time that we went through a reset.  Q Okay. As of
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q is it true providication in terms of the providication in terms of the provided and the p	Yes.  And in addition to the Primavera database, use that you were also responsible for ing the updated BLRA milestone reports that we at earlier?  I was responsible for the construction milestones. Westinghouse was responsible for the rones, which consisted mainly of either a mg issue or a licensing activity or a licensing activity or a licensing activity or a lement.  Is it fair to state that you always made lest effort to ensure that the updated one schedules you provided to the owners led the most current information concerning loject schedule?  That's correct.  And do you recall, as of March of 2017, the most recent BLRA milestone report reflected ins of the status of meeting the guaranteed intial completion dates?  No, I do not.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	September 1, 2015, that would be a reference to the active schedule; is that right?  A That would have the column that says "Reset Milestone Date as of September 1st, 2015" would be the last would be the date that, for the ones not complete, would have been rebaselined and approved by the ORS, PSC.  Q That's for the incomplete ones, that references the most recent approved date for the protected items is your understanding?  A Most recent, I'm not sure about.  Q Okay.  A I don't remember the last time that we went through a reset.  Q Okay. As of  A But if you say so.  Q Go ahead.  A I'm good.  Q All right. And then you've got the actual completion date, which references either the dates completed or a projection; is that right?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q is it true providi looked A BLRA r the oth licensii procur Q your b milesto reflecto the pro Q what the in term substa	Yes.  And in addition to the Primavera database, use that you were also responsible for ing the updated BLRA milestone reports that we at earlier?  I was responsible for the construction milestones. Westinghouse was responsible for the rones, which consisted mainly of either a mg issue or a licensing activity or a mement.  Is it fair to state that you always made est effort to ensure that the updated one schedules you provided to the owners ed the most current information concerning object schedule?  That's correct.  And do you recall, as of March of 2017, the most recent BLRA milestone report reflected the soft the status of meeting the guaranteed intial completion dates?  No, I do not.  MR. KEEL: Let's mark that Exhibit 5.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	September 1, 2015, that would be a reference to the active schedule; is that right?  A That would have the column that says "Reset Milestone Date as of September 1st, 2015" would be the last would be the date that, for the ones not complete, would have been rebaselined and approved by the ORS, PSC.  Q That's for the incomplete ones, that references the most recent approved date for the protected items is your understanding?  A Most recent, I'm not sure about.  Q Okay.  A I don't remember the last time that we went through a reset.  Q Okay. As of  A But if you say so.  Q Go ahead.  A I'm good.  Q All right. And then you've got the actual completion date, which references either the dates completed or a projection; is that right?  A If it says "actual," that's actual.  Q Okay. And then you've got the delta from
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q is it true providi looked A BLRA r the oth licensii procur Q your b milesto reflecto the pro Q what the in term substa	Yes.  And in addition to the Primavera database, use that you were also responsible for ing the updated BLRA milestone reports that we at earlier?  I was responsible for the construction milestones. Westinghouse was responsible for the rones, which consisted mainly of either a mg issue or a licensing activity or a licensing activity or a licensing activity or a lement.  Is it fair to state that you always made lest effort to ensure that the updated one schedules you provided to the owners led the most current information concerning loject schedule?  That's correct.  And do you recall, as of March of 2017, the most recent BLRA milestone report reflected ins of the status of meeting the guaranteed intial completion dates?  No, I do not.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	September 1, 2015, that would be a reference to the active schedule; is that right?  A That would have the column that says "Reset Milestone Date as of September 1st, 2015" would be the last would be the date that, for the ones not complete, would have been rebaselined and approved by the ORS, PSC.  Q That's for the incomplete ones, that references the most recent approved date for the protected items is your understanding?  A Most recent, I'm not sure about.  Q Okay.  A I don't remember the last time that we went through a reset.  Q Okay. As of  A But if you say so.  Q Go ahead.  A I'm good.  Q All right. And then you've got the actual completion date, which references either the dates completed or a projection; is that right?  A If it says "actual," that's actual.  Q Okay. And then you've got the delta from

Page: 39 (135 - 138)

## Terry Elam Page 139 Page 141 1 That's correct. 1 for the project impact cost more than schedule? 2 Okay. And if you'd turn to page 7 of 7 on That's not my area of expertise. 3 Exhibit 5. 3 Q Okay. Do you --Α 4 Cost is not. 5 And you look down the middle of the page, 5 Sorry. Go ahead. What did you say? 6 tracking ID 133 references Unit 2 substantial 6 Cost is not my area of expertise. completion, and it has a delta of plus 6. 7 Yeah. Do you know whether these late 2016 8 Do you see that? projections from Fluor and WECTEC were focused on 9 9 I do see that. the cost to complete the remaining part of the 10 So is that saying that as of this 10 project? 11 11 March 2017 tracking, the Unit 2 substantial Α I can't answer that. completion date was projected to be six months Do you recall if the updated estimates in behind the September 1st, 2015, date? 13 late 2016 from WECTEC and Fluor were revised 14 A Yes. projections of the schedule for the project? And then if you look down at the bottom, The estimate itself has nothing to do with 15 16 item 146, the Unit 3 substantial completion date has 16 the schedule. It's data. 17 a delta of zero. 17 Q The manhours to completion wouldn't 18 Α Yes. necessarily impact the schedule? So as of March of 2017, the projected 19 A I didn't say that. 20 completion date for Unit 3 was equivalent to where 20 Q Okay. it was set as of September 1st, 2015? 21 Okay. The question you asked was: Did 22 A Yes, it was in the same month. 22 the manhour estimates affect the schedule? 23 Q And in response to Mr. Cox's questioning, 23 Q I asked: Do you recall if the updated 24 you made a reference to updated estimates that were 24 estimates in late 2016 from WECTEC and Fluor were 25 received sometime in late 2016. 25 revised projections of the schedule for the project? Page 140 Page 142 A They were -- they were revised 1 Do you recall that? 2 Α Yes. 2 projections, but schedule is not in the equation at I just want to ask you a few questions 3 that point. 3 Q Did Fluor and WECTEC ever get to a point about that. 5 Who put together those estimates in late where they were putting together a revised schedule 6 2016? for the project? 7 Specific to a name? 7 A There were many scenarios ran with the Α No. What organization? 8 revised estimate manhours in late '16 and early '17. 8 9 So there was a lot of -- a lot of work done with the A It would have been C -- it would have been 10 WECTEC and Fluor. Westinghouse, WECTEC, Fluor. 10 new numbers. 11 Q Had you actually seen those late 2016 11 Q Okay. So there was a lot of work being 12 estimates? 12 done in that time period, late 2016, early 2017, 13 Α Yes. 13 with the revised estimates of manhours. But do you 14 Do you recall what they were estimates 14 know whether that -- they ever completed that work? 15 for? 15 A When you say "complete," further define 16 A The manhour completions for the project. 16 "complete." Help me out there with your question. 17 Were they estimated cost or schedule or 17 Sure. both, if you know? As far as you know, prior to the 18 18 19 Repeat your question. 19 Westinghouse's bankruptcy filing, did Fluor and 20 20 WECTEC finish their work in coming together with Sure. 21 They were -- you said the estimates that 21 new revised estimates for the cost or schedule of 22 Fluor and WECTEC put together in late 2016 were the 22 the project?

That's correct.

24

manhour completions for the project. Is that right?

Okay. Now, does the manhour completions

A And when you say "complete," again, are

24 you asking me if the information was ever presented

25 to SCE&G, the final outcome of this product?

ı	Terry		
	Page 143		Page 145
1	I'm not exactly sure where we're going	1	could to meet the projected substantial completion
2	with the question, so I need to better understand	2	dates; is that fair?
3	"complete" and what you mean by that.	3	A Yes.
4	Q Sure.	4	Q Mr. Elam, were you ever involved in
5	Well, let's let's take your example.	5	communicating information about the project to ORS?
6	As far as you know, was the Fluor and WECTEC did	6	A Yes.
7	they ever present the results of their analysis to	7	Q And how were you involved in communicating
8	SCE&G prior to the bankruptcy filing of	8	information about the project to ORS?
9	Westinghouse?	9	A Had a meeting once a month. After we
10	A Honestly, I can't remember.	10	would issue the schedule information, there would be
11	Q That's fine.	11	a scheduled meeting with the ORS. And I was asked
12	A You said prior to the bankruptcy	12	to attend that meeting and try to answer any
13		13	questions, specific questions they had about
14	Q Mr. Cox had referenced earlier in his	14	
15	questioning an amendment that was put together	15	
16		16	Q So did you attend these monthly meetings
17	Do you recall that?	17	with the ORS throughout your time working on the
18	A I remember a question earlier about fixed		project?
19	price, did I know something about fixed price. I	19	A (I would say in the last 18 months or so.)
20	remember that question that he asked me.	20	
21	Q Okay. Do you recall that there was an	21	the latter years of the project, not at the
22	amendment to the EPC contract in late 2015?	l	O And what type of information would you
23	A Yes, during the acquisition by	23	Q Tha Mac cype of mormation would you
	Westinghouse of CB&I.	24	3 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2
25	Q Yeah. Okay. And as part of that	25	, , , , , , , , , , , , , , , , , , , ,
	Page 144		Page 146
1 1			
-	amendment, did you understand that the consortium,	1	Q Okay. When you responded to any questions
2	or Westinghouse specifically, was committing to new	1 2	Q Okay. When you responded to any questions that the ORS had, did you always do so honestly?
		1 =	Q Okay. When you responded to any questions
2	or Westinghouse specifically, was committing to new	2	Q Okay. When you responded to any questions that the ORS had, did you always do so honestly?  A Yes.  Q Did you always provide the ORS what you
2	or Westinghouse specifically, was committing to new guaranteed substantial completion dates?	3	Q Okay. When you responded to any questions that the ORS had, did you always do so honestly?  A Yes.
2 3 4 5	or Westinghouse specifically, was committing to new guaranteed substantial completion dates?  A At what point?	2 3 4 5	Q Okay. When you responded to any questions that the ORS had, did you always do so honestly?  A Yes.  Q Did you always provide the ORS what you
2 3 4 5	or Westinghouse specifically, was committing to new guaranteed substantial completion dates?  A At what point?  Q Well, at any point did you understand	2 3 4 5	Q Okay. When you responded to any questions that the ORS had, did you always do so honestly?  A Yes. Q Did you always provide the ORS what you believed was complete and accurate information in response to their questions?
2 3 4 5 6	or Westinghouse specifically, was committing to new guaranteed substantial completion dates?  A At what point?  Q Well, at any point did you understand that?	2 3 4 5 6	Q Okay. When you responded to any questions that the ORS had, did you always do so honestly?  A Yes. Q Did you always provide the ORS what you believed was complete and accurate information in response to their questions?
2 3 4 5 6 7	or Westinghouse specifically, was committing to new guaranteed substantial completion dates?  A At what point?  Q Well, at any point did you understand that?  A After after I became a	2 3 4 5 6 7	Q Okay. When you responded to any questions that the ORS had, did you always do so honestly?  A Yes. Q Did you always provide the ORS what you believed was complete and accurate information in response to their questions?  A Yes. Q Do you know what information about
2 3 4 5 6 7 8	or Westinghouse specifically, was committing to new guaranteed substantial completion dates?  A At what point? Q Well, at any point did you understand that? A After after I became a Westinghouse/WECTEC employee, yes, which was January	2 3 4 5 6 7 8	Q Okay. When you responded to any questions that the ORS had, did you always do so honestly?  A Yes. Q Did you always provide the ORS what you believed was complete and accurate information in response to their questions? A Yes. Q Do you know what information about schedule of the project was made available to the
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2 3 4 5 6 7 8 9 10 11 12 13 14	or Westinghouse specifically, was committing to new guaranteed substantial completion dates?  A At what point?  Q Well, at any point did you understand that?  A After after I became a Westinghouse/WECTEC employee, yes, which was January the 2nd of 2016  Q Okay.  A but not prior to.  Q Okay. And you understood, at least as of the time you became an in-house WECTEC employee, that the amendment to the EPC contract provided the owners with the option of electing a fixed price for	2 3 4 5 6 7 8 9 10 11 12 13 14	Q Okay. When you responded to any questions that the ORS had, did you always do so honestly?  A Yes. Q Did you always provide the ORS what you believed was complete and accurate information in response to their questions? A Yes. Q Do you know what information about schedule of the project was made available to the ORS as part of these monthly meetings? A No, I do not. Q Okay. Was the information that you would convey to the ORS consistent with the information you would convey to the owners about the schedule of the project?
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Page: 41 (143 - 146)

## Page 147 Page 149 1 don't remember any specifics other than they would Okay. So the first document is just a 2 have their list of questions to ask. 2 cover e-mail that's from Cynthia Lanier to Kyle Q Okay. And when you say they would ask 3 Young, yourself, and copying Alan Torres. 4 about comparison from one month to the next month, 4 Do you see that? 5 what do you mean by that? 5 Yes. Α If, say, we had a critical path change, or 6 And it says it's referring to follow-up 7 new module information that had come in, or a piece 7 action items from last month's ORS briefing. 8 of equipment, they would -- they would ask, based on Did you see that? 9 the previous month's schedule, "Why didn't this Yes. activity drive fuel load or some other milestone 10 And then there are three attachments that within the project?" 11 are behind the documents. The first one I want to 12 And we would have to explain what we did 12 ask you to -- or ask you questions about is page 1 13 13 that's titled, "SCE&G V.C. Summer Units 2 and 3, to mitigate the issue. 14 MR. KEEL: Let's go ahead and mark this as August 23rd in 2014 -- August 23rd and 24th, 2016, 15 6. 15 ORS Site Visit Agenda." 16 16 Do you see that, sir? 17 17 (E-mail correspondence dated 9/8/16, Yes, sir. 18 ORS\_SCEG\_00527443-527454, marked Elam 18 Now, are these documents referring to one 19 Exhibit Number 6 for identification.) of the regular monthly meetings that you talked 20 20 about earlier with the ORS? 21 MR. RYAN: Are you going to ask more about 21 I can't answer yes or no. 22 the attachment or --22 Okay. Were those regular monthly meetings 23 MR. KEEL: I'm not going to ask about the 23 with the ORS conducted on-site? 24 24 e-mail. I'm only going to ask about a couple Yes. 25 of items in the agenda and the summary on the 25 0 And then if you look down on the agenda, Page 150 Page 148 ${\tt 1}{\tt it's}$ got two days there. In the middle of the day, 1 last page. 2 2 Tuesday, August 23rd, 2016, refers to THE WITNESS: The agenda being page 1? 3 MR. KEEL: Yeah, page -- I think it goes "Scheduling/Risk Management, Terry Elam and Kyle." 4 on. I'm not going to ask you about all of it. 4 Do you see that? 5 I just have a couple of particular things I A Yes, sir. 6 want to point out. I think it goes 1 through And who is the Kyle referring to there? 7 8. And then the last page is the summary. The 7 Speculating, Kyle Young. 8 one behind that, Mr. Elam. 8 Okay. And it looks like you were slotted 9 THE WITNESS: That's the same as on the 9 on the agenda with Mr. Young to discuss 10 front. scheduling/risk management with the ORS from 1:30 to 11 MR. KEEL: There's one on the back of 11 2:30 on August 23rd, 2016. 12 12 Do you see that? that. 13 MR. RYAN: Let's take a look. 13 Α Yes. 14 MR. KEEL: Take your time. Okay. What type of information was 15 THE VIDEOGRAPHER: The time is 5:23, and 15 communicated to the ORS about scheduling/risk 16 we are off the record. 16 management in this meeting? 17 17 (Recess in the proceedings from 5:23 MR. RYAN: Object to form. 18 18 THE WITNESS: I answered the questions to 5:29.) that the ORS asked. I didn't present. I 19 THE VIDEOGRAPHER: The time is 5:29 p.m., 19 and we are back on the record. 20 20 strictly answered questions. 21 BY MR. KEEL: 21 BY MR. KEEL: 22 Q Mr. Elam, before we took a break, I had 22 Q Okay. Would Mr. Young have presented 23 information on scheduling/risk management? 23 handed you what's been marked as Exhibit Number 6 24 for your deposition. Do you recognize this? A I don't know what schedule information was 25 25 provided to the ORS. We did not provide it. We --Not really.

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## Page 151 Page 153 1 WECTEC, Shaw, CB&I -- did not provide information 1 I don't know what kind of information they got. 2 directly to the ORS. We'll leave it at that. Q Okay. But the ORS would ask you questions 3 BY MR. KEEL: 4 about the schedule, right? Q Okay. From the questions that you would Yes. 5 receive at these meetings with the ORS, did you get Q Based on the questions they would ask, did 6 the impression that they at least had some 7 you get the impression that they had access to at 7 information about how the status of the project 8 least some information about the schedule of the 8 compared to the schedule? A I think the information that they had 9 project? 10 A Yes, they would have had to. 10 (allowed them to compare one month to the other) 11 They would have had to have had access to 11 month. The status of the project, I don't know what 12 the schedule of the project to ask the questions 12 they knew about the status of the project. they were asking you; is that fair? Q Okay. If you look down on this same page, 14 A That's fair. 14 page 1 of Exhibit Number 6, under "Contractor 15 15 Briefings," there's a little A for "Project Status And would the information about the 16 schedule of the project reflect, roughly, where the 16 and Transition," and then in parens there, "Carl 17 Churchman and Jeff Hawkins." status of the project was in comparison to the 18 projected schedule? 18 Who was Carl Churchman? Who is Carl 19 MR. RYAN: Object to form. 19 Churchman? 20 THE WITNESS: You'll have to ask me that Carl Churchman was the -- I don't know his 20 21 21 official title, but he was the head Westinghouse guy again. BY MR. KEEL: on the site. 22 23 23 Sure. 0 Okay. And who is Jeff Hawkins? 24 24 Would the type of scheduling information He was the lead Fluor person on-site. 25 that the ORS would have had access to, based on the 25 Okay. And the second bullet point down Page 152 Page 154 1 questions you were asked, indicate how the status of 1 here says: "Please provide the plan for 2 the project compared with the projected dates in the 2 accelerating the production to an overall rate of 3 schedule? 3 3 percent per month and provide a comparison to 4 MR. COX: Object to form. 4 historical rates." Paren, "Repeated from previous 5 THE WITNESS: The ORS could only see 5 meeting," closed paren. 6 whatever information was provided to them. Do you see that? 7 So therefore, I don't quite understand how I see it. 8 to answer your question about where it was 8 Q Do you recall being present at meetings 9 projected. 9 with the ORS in which there was a discussion about a 10 Now, you know, if your question relates to 10 plan for accelerating the production to an overall 11 the information they were provided two months 11 rate of 3 percent per month in comparison to 12 prior to that meeting, you know, yes, they 12 historical rates? 13 could have looked at where we forecasted to be 13 No, I do not. 14 from the two months previous to the month that Do you have any reason to doubt that 15 they were actually reviewing. 15 this -- there was a discussion about sub bullet 2 16 So I'm not sure how to answer your 16 here in a meeting with the ORS? 17 17 question, sir. MR. COX: Object to form. THE WITNESS: I can't answer. I don't 18 BY MR. KEEL: 18 19 19 Q Okay. Do you know if the scheduling know. 20 information that was provided to the ORS would 20 BY MR. KEEL: 21 provide the type of variance or deltas that we've 21 Q Now, if you turn to the very last page of seen in the different scheduling reports? 22 this Exhibit Number 6, the title is "August 23rd-24, MR. RYAN: Object to form. 23 2016, ORS Site Visit Summary." MR. COX: Object to form. 24 Do you see that at the top? THE WITNESS: I can't answer that because 25 Yes.

Page: 43 (151 - 154)

	Terry	Elar	<u>n</u>
	Page 155		Page 157
1	Q Okay. And in the middle of the page	1	Q And what questions did Gary Jones ask you?
2	there's a paragraph that starts in bold, "Briefings	2	A I have no clue.
3	by NND management." And the third sentence in there	3	Q Do you remember, roughly, what type of
4	says: "Terry Elam provided an update on the project	4 (	juestions?
5	schedule."	5	A They would be schedule-related questions.
6	Do you see that?	6	Q Okay. Do you recall Gary Jones or other
7	A Yes.		epresentatives of the ORS asking questions about
8	Q What information did you provide about the	_	nitigation plans that were put in place to meet the
9	project schedule to the ORS during this meeting?	_	chedule?
10	MR. RYAN: Object to form.	10	MR. RYAN: Object to form.
11	THE WITNESS: I can't answer that. I	11	THE WITNESS: Yes.
12	don't know the answer.	12 F	BY MR. KEEL:
13	BY MR. KEEL:	13	Q Do you recall Gary Jones or other
14	Q What information would you generally		epresentatives of the ORS asking questions about
15	provide to the ORS about the schedule at these	_	productivity on the project?
16	meetings? I know you've said you would respond to	16	A Not in not in my sessions.
17	their questions, but do you recall	17	Q But in other sessions, do you recall that?
18	A I responded to their questions only.	18	A I have no clue.
19	Q Do you recall any particular questions you	19	MR. KEEL: I'll just look through my notes
20	were asked and what information you provided in	20	here.
	response?	21	
22		22	Mr. Elam, I have no more questions. Thank
	•	23	you very much for your time.
23	Q And the second to last paragraph on this		THE WITNESS: Thank you.
24	page, "ORS Debrief With Our Team," the second to	24	MR. RYAN: Thank you. No further
25	last sentence refers to: "Gary Jones reiterated his	25	questions from anyone?
	Page 156		Page 158
l .	pleasure with the progress of the project and hoped	1	For the record, we'd just like to reserve
	the progress would continue."	2	the right to designate all or some of the
3	Do you see that?	3	portions of the transcript confidential.
4	A Yes.	4	MR. KEEL: Do you want to read and sign?
5	Q Were you ever present for any discussion	5	MR. RYAN: Yes, we'll read and sign.
6	in which Gary Jones said something to the effect of	6	THE VIDEOGRAPHER: The time is 5:41 p.m.,
7	what's reflected in that sentence?	7	and this concludes today's deposition of Terry
8	A No.	8	Elam. And we are off the record.
9	Q Do you know who Gary Jones is?	9	
10	A Yes.	10	(Witness excused.)
11	Q And who was Gary Jones?	11	
12	A Gary Jones was a member of the ORS team.	12	(Deposition was concluded at 5:41 p.m.)
13	Q Okay. Did you ever provide any	13	
14	information, orally or otherwise, to Gary Jones	14	
15	about the status of the project?	15	
16	A Only in meetings, this meeting, if	16	
17	specifically asked a question.	17	
18	Q Do you recall whether Gary Jones asked you	18	
19	questions about the project during any meetings with	19	
20	the ORS?	20	
21	A So your question is: During any of these	21	
22	monthly meetings with the ORS, did Gary Jones ever	22	
23	ask me a question?	23	
24	Q Yes.	24	
25	A Yes, he did.	25	

Page: 44 (155 - 158)

1		SIGN.	IATURE OF DEPONENT
2		I, the un	ndersigned, TERRY ELAM, do hereby
3	certify	that I have	e read the foregoing deposition
4	transcri	pt and find	l it to be a true and accurate
5	transcri	ption of my	testimony, with the following
6	correcti	ons, if any	r:
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22			
23	DATE	<u> </u>	ERRY ELAM
24	21111	1.	
25			

1	CERTIFICATE OF REPORTER
2	
3	I, Cynthia First, Registered Professional Reporter and Notary Public for the State of North Carolina at Large, do hereby certify:
4	That the foregoing deposition was taken before me on the date and at the time and location
5	stated on page 1 of this transcript; that the deponent was duly sworn to testify to the truth, the
6	whole truth and nothing but the truth; that the testimony of the deponent and all objections made at
7	the time of the examination were recorded stenographically by me and were thereafter
8	transcribed; that the foregoing deposition as typed is a true, accurate and complete record of the
9	testimony of the deponent and of all objections made at the time of the examination to the best of my
10	ability.  I further certify that I am neither
11	related to nor counsel for any party to the cause
12	pending or interested in the events thereof. Witness my hand, I have hereunto affixed my official seal this 15th day of October 2018, at Charlotte,
13	Mecklenburg County, North Carolina.
14	
15	
16	Cynthia First,
17	Registered Professional Reporter Notary Public
18	State of North Carolina at Large My Commission expires:
19	August 2, 2020
20	
21	
22	
23	
24	
25	

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## August 1, 2014 Integrated Project Schedule Review VC Summer

Nothing contained in this presentation constitutes a waiver of Contractor's right and remedies under the EPC Agreement. Contractor reserves all rights and remedies.



EXHIBIT

LESSON

LOTTE/18 OF

ELEGIBRONICALLY-FILED - 2018 December 5 5:11 PM - SCPSC - Docket # 2017-370-E - Page 47 of 118

## Summary

- Period of Review with the Owner and the IPS will not be official until this review is Complete This presentation of the Integrated Project Schedule (IPS) Scenarios is intended to begin a
- Unit 2 Substantial Completion June 2019 (Impacted/Partially Accelerated)
- Includes substantial acceleration efforts to date
- 5X10 construction work schedule with selective extended work periods for near term walls, Shield Building concrete layers up to "G" and Containment layer "1A" concrete & structural/mechanical modules
- Fabrication and delivery of the Shield Building panels are based on the delivery dates provided by the vendor
- Critical Assumptions
- Fabrication and delivery of Main Steam/Feed Water penetration module will support construction needs
- Issues resolved and information received to support Aux Building Wall 11 Main Steam/feed Water Module
- Unit 2 Substantial Completion December 2018 (Accelerated)
- All items from above apply
- Accelerate Shield Building design/fabrication /erection such that the Shield Building and Containment are parallel critical paths.
- CA01 sub-module deliveries support the set date March of 2015
- Additional Engineering/Procurement/Construction /Licensing Items have to be accelerated





Proprietary and Confidential

# Summary (Cont.)

- Unit 2 & 3 (Potential Additional Acceleration)
- Potential for additional optimization may be possible with support from the owner, for example, in the areas of pre-operational and startup testing.
- Opportunities during bulk construction are limited
- Work with SCANA to identify opportunities starting at Integrated Flush through Power Ascension
- Support from Licensing and NRC may be required due to the compression
- Unit 3 Substantial Completion 12 month offset after Unit 2 Substantial Completion June 2020
- CA05, CA20 and CA01 sub-module deliveries continue to support a 12 month Substantial Completion lag from Unit 2 schedule
  - Long lead procurements support site needs (mechanical modules, bellows, MS/FW penetrations panels, etc.)
    - Shield Bldg. panel deliveries support a June 2020 Substantial Completion schedule
- Substantial Completion December 2019
- Shield Building activities to be accelerated comparable to Unit 2
  - Structural Module deliveries will support the acceleration also



## Critical Path

# Critical Path Scenarios

- VC Summer Unit 2 Substantial Completion June 2019 (Impacted/Partially Accelerated)
- The critical path proceeds through shield building wall panel deliveries from NNI into wall tension ring, top hat, shield building roof and setting of the PCS tank module on erection of the shield building walls and installation of the air intake structure, shield the roof. The path continues to operational testing through Fuel Load, continuing through Power Ascension, 100 percent power, then Substantial Completion.

# VC Summer Unit 2 – Substantial Completion December 2018 (Accelerated)

- in containment. The path proceeds through setting the reactor vessel, RCS piping and (LC) through the onsite assembly and setting of CA01 and civil commodity installation The critical path proceeds through CA01 sub module deliveries from Lake Charles operational testing through Fuel Load, continuing through Power Ascension, 100 installation of SG's (and bulk commodities in general). The path continues to percent power then Substantial Completion.
- The Shield Building continues to be a near term competing critical path in this

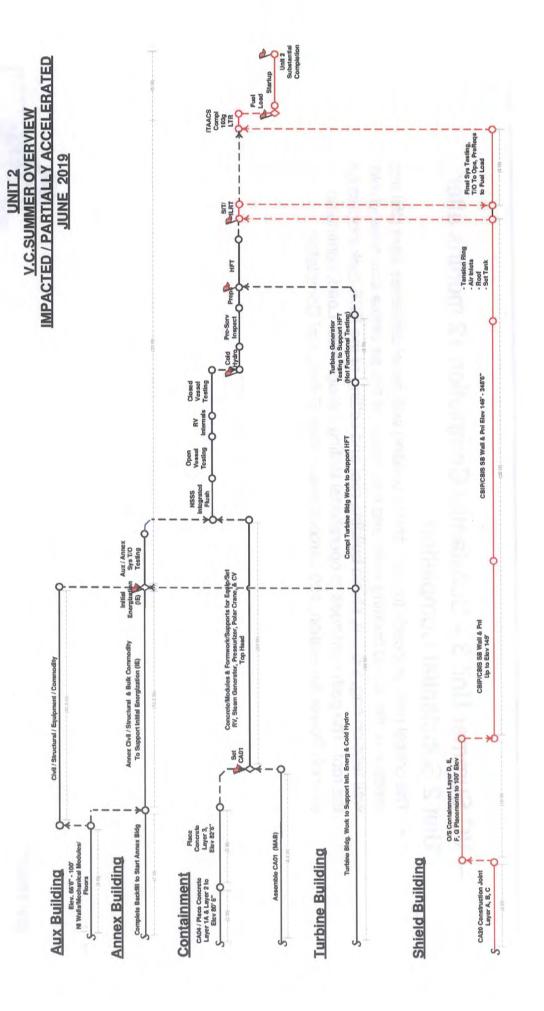


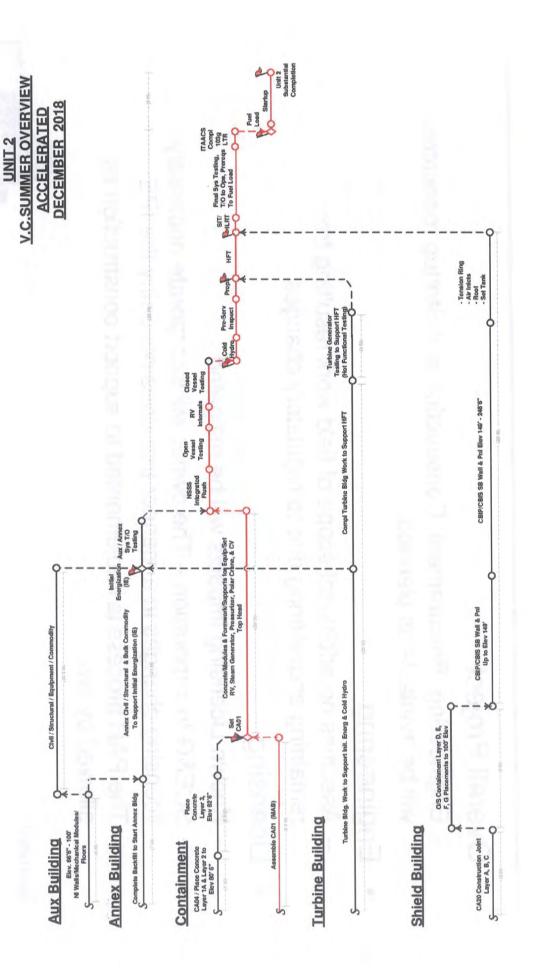
# Critical Path (Cont.)

- VC Summer Unit 3 Substantial Completion 12 months after Unit 2 Substantial Completion
- The critical path proceeds through shield building wall panel deliveries from NNI into wall tension ring, top hat, shield building roof and setting of the PCS tank module on erection of the shield building walls and installation of the air intake structure, shield the roof. The path continues to operational testing through Fuel Load, continuing through Power Ascension, 100 percent power, then Substantial Completion.









## Assumptions

- Overall Project
- Engineering, Procurement, Construction and Startup resources will be available as planned.
- Engineering
- Assumes no additional scope of field work resulting from remaining engineering due to regulatory changes
- Licensing
- Known Licensing impacts will be mitigated
- SCE&G Incorporation The owner will incorporate necessary licensing changes in a manner that does not delay the IPS
- The PAR process is implemented to support construction as allowed by law





# Assumptions (Cont.)

# Start-up & Testing

- Temporary Modifications will be used as required for Start-up and Testing
- Owner's programs are available to support Component & Preoperational Testing
- Owner supports Joint Test Group review of test documents
- Owner program implementation during preoperational testing does not impact test schedule
- Digital test strategy and associated implementation plan acceptance by NRC
- Alternate NDE methods can be used for CPT/ILRT instead of followed by baffle plate installation after CPT/ILRT is not soap bubble test. (Extended duration for bubble testing scheduled)



# Assumptions (Cont.)

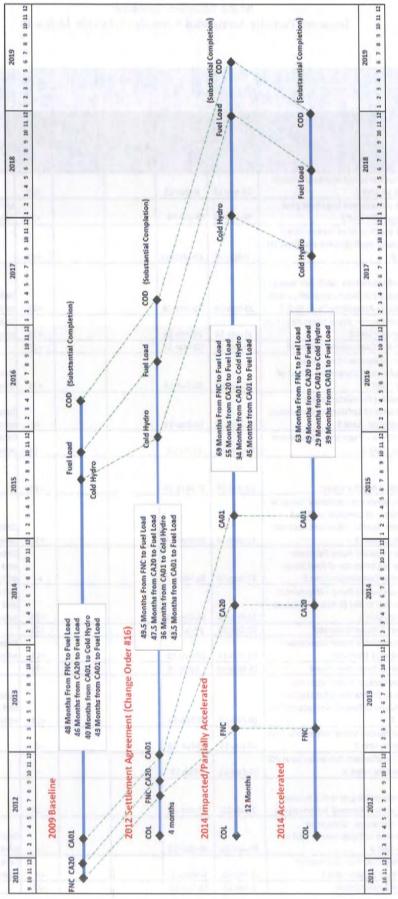
- Start-up & Testing
- NRC approval of Simulator and qualified operators available in time prior to Fuel Load
- Licensing/Owner/NRC has enough time for removing FOAK tests out of Unit 3 License prior to required performance
- Duration between all ITAAC complete and NRC issuance of 103.g letter is sufficient





# VC Summer IPS History

# Unit 2 Integrated Project Schedule Historical Comparison From Baseline to Current







Proprietary and Confidential

## BLRA Milestone Tracking Impacted/Partially Accelerated Schedule - U2 COD: 13-Jun-19

Lracking IO	Primavara Activity ID	Milestone Description	Reset Milestone Date	Month End Milestone Date	New Date	Actual Completion Date	Delta Months from Reset Milestone Date	Internal Notes
88	2CCCT107XX017	Set Nuclear Island structural module CA03 for Unit 2	26-Jun-13	4-Nov-15			+29	A TOTAL STREET
92	2CMCT084XX086	Start containment large bore pipe supports for Unit 2	28-Jun-13	13-Jun-14			+12	Unit 2 Large Bore Pipe Supports started on June 13th, 2014
97	2CCCT135XX110	Start concrete fill of Nuclear Island structural modules CA01 and CA02 for Unit 2	3-Apr-14	20-May-16			+25	
		Refueling Machine Fabricator Notice to Contractor of Satisfactory Completion						Delay due to schedule refinement and
99	POWXXXXPSCM709	of Factory Acceptance Test - Unit 2 Deliver Reactor Vessel Internals to Port	30-Nov-13	30-Nov-14			+12	schedule re-sequencing.  Delay due to subsequent delay in predecessor
100	POWXXXXPSCM710	of Export - Unit 2	31-Jan-14	28-Feb-15			+13	schedule activities.
101	2CMCT205XX020	Set Unit 2 Containment Vessel #3	24-Apr-14	10-Mar-16			+23	The state of the s
102	POWXXXXPSCM711	Steam Generator - Contractor Acceptance of Equipment at Port of Entry - Unit 2 Pressurizer Fabricator Notice to	31-Jul-13	31-Oct-14			+15	Delay due to subsequent delay in predecessor schedule activities.
104	POWXXXXPSCM713	Contractor of Satisfactory Completion of Hydrotest - Unit 3	31-Mar-14	30-Sep-14			+6	Delay due to subsequent delay in predecessor schedule activities.
105	POWXXXXPSCM714	Polar Crane - Shipment of Equipment to Site - Unit 2	31-Jan-14	31-Jul-15			+18	Delay due to schedule refinement and schedule re-sequencing.
107	2CMCT100RX130	Set Unit 2 Reactor Vessel Steam Generator Fabricator Notice to	23-Jun-14	27-May-16		111	+23	
108	POWXXXXPSCM715	Contractor of Completion of 2nd Channel Head to Tubesheet Assembly Welding - Unit 3	31-Dec-13	30-Nov-14			+11	Delay due to subsequent delay in predecessor schedule activities.
109	POWXXXXPSCM716	Reactor Coolant Pump Fabricator Notice to Contractor of Final Stator Assembly Completion - Unit 3	31-Aug-14	31-Mar-15			+7	Delay associated with supplier design changes and subsequent delay in predecessor schedule activities
110	POWXXXXPSCM717	Reactor Coolant Pump - Shipment of Equipment to Site (2 Reactor Coolant Pumps) - Unit 2	31-Oct-13	31-Dec-15			+26	Delay associated with supplier design changes and subsequent delay in predecessor schedule activities
112	2CMCT084SG127	Set Unit 2 Steam Generator	23-Oct-14	27-Jul-16	12.3		+21	3 120 - 5 100
114	P3WXXXXPSCM348	Complete Unit 3 Steam Generator Hydrotest at fabricator	28-Feb-14	28-Feb-15			+12	Delay due to schedule refinement and schedule re-sequencing.
116	2CMCT118RC135	Set Unit 2 Pressurizer Vessel	16-May-14	13-Jun-16			+25	
117	POWXXXXPSCM720	Reactor Coolant Pump Fabricator Notice to Contractor of Satisfactory Completion of Factory Acceptance Test - Unit 3	28-Feb-15	30-Sep-16			+19	Delay associated with supplier design changes and subsequent delay in predecessor schedule activities
118	POWXXXXPSCM721	Deliver Reactor Vessel Internals to Port of Export - Unit 3	30-Jun-15	28-Feb-16			+8	1 3 1 1 5
119	POWXXXXPSCM722	Main Transformers Fabricator Issue PO for Material - Unit 3	28-Feb-15	2-Feb-15			_	
120	2CMCT118RN195	Complete welding of Unit 2 Passive Residual Heat Removal System piping	5-Feb-15	31-Oct-16			+20	
121	POWXXXXPSCM723	Steam Generator - Contractor Acceptance of Equipment at Port of Entry - Unit 3	30-Apr-15	30-Nov-15			+7	Delay due to subsequent delay in predecessor schedule activities.
	The second secon	Refueling Machine - Shipment of					10/	Delay due to schedule refinement and

## BLRA Milestone Tracking Impacted/Partially Accelerated Schedule - U2 COD: 13-Jun-19

n n	Primavara Activity ID	Milestone Description	Reset Milestone Date	Month End Milestone Date	New Date	Actual Completion Date	Delta Months from Reset Milestone Date	internal Notes
124	POWXXXXPSCM725	Reactor Coolant Pumps - Shipment of Equipment to Site - Unit 3	30-Jun-15	31-Oct-16			+16	Delay associated with supplier design changes and subsequent delay in predecessor schedule activities
125	POWXXXXPSCM726	Main Transformers Ready to Ship - Unit 3	31-Jul-15	31-May-15			-2	Maria Maria
126	P0WXXXXPSCM727	Spent Fuel Storage Rack - Shipment of Last Rack Module - Unit 3	31-Jul-14	15-Sep-14		M. Com	+2	The second
127	2CEAU066XX1145	Start electrical cable pulling in Unit 2 Auxillary Building	14-Aug-13	25-Oct-16			+38	
128	2VSMILPM00052	Complete Unit 2 Reactor Coolant System cold hydro	22-Jan-16	14-Feb-18	-	2	+25	
129	2VSIDPT00458	Activate class 1E DC power in Unit 2 Auxilary Building.	15-Mar-15	27-May-17			+26	
130	2VSMILPM00076	Complete Unit 2 hot functional test.	3-May-16	16-Jun-18			+25	
131	3CMCT205XX020 2VSCSFLT1235	Install Unit 3 ring 3 for containment vessel  Load Unit 2 nuclear fuel	25-Aug-15	4-Aug-16			+12	
		Load Onic 2 nuclear ruei	15-Sep-16	11-Dec-18		3	+27	
133	C1009TN072	Unit 2 Substantial Completion	15-Mar-17	13-Jun-19			27	
134	3CMCT100RX130	Set Unit 3 Reactor Vessel	22-Oct-15	20-Mar-17			+17	
135	3CMCT084SG127	Set Unit 3 Steam Generator #2	25-Feb-16	18-Jul-17			+17	a second
136	3CMCT118RC135	Set Unit 3 Pressurizer Vessel	16-Jul-15	3-Apr-17			+21	
137	3CMCT118RN195	Complete welding of Unit 3 Passive Residual Heat Removal System piping	16-Jun-16	14-Nov-17	3		+17	t had it make
138	3CMCT239MH130	Set Unit 3 polar crane	9-May-16	15-Sep-17			+16	
139	3CCTB254BL970	Start Unit 3 Shield Building roof slab rebar placement	26-May-16	14-Feb-17	LI STATE OF		+9	f + con-part
140	3CEAU066XX1145	Start Unit 3 Auxiliary Building electrical cable pulling	7-Nov-14	8-Sep-17	1		+34	
141	3VSIDPT00458	Activate Unit 3 Auxiliary Building class 1E DC power	15-May-16	5-May-18			+24	
	20200002002022	Complete Unit 3 Reactor Coolant		Library		311	and the same	
142	3VSMILPM00052	System cold hydro	22-Mar-17	10-Feb-19			+23	
143	3VSMILPM00076	Complete Unit 3 hot functional test	3-Jul-17	13-Jun-19			+23	
144	3VSCSFLT1235	Complete Unit 3 nuclear fuel load	15-Nov-17	5-Dec-19			+25	
145	3VSCS100PP340	Begin Unit 3 full power operation	8-Apr-18	18-May-20			+25	
146	3VSCSPTHHR110	Unit 3 Substantial Completion	15-May-18	7-Jun-20			+25	

## BLRA Milestone Tracking Accelerated Schedule - U2 COD: 05-Dec-18

Tracking ID	Primavara Activity ID	Milestone Description	Reset Milestone Date	Month End Milestone Date	New Date	Actual Completion Date	Delta Months from Reset Milestone Date	internal Notes
88	2CCCT107XX017	Set Nuclear Island structural module CA03 for Unit 2	26-Jun-13	28-Aug-15			+26	
92	2CMCT084XX086	Start containment large bore pipe supports for Unit 2	28-Jun-13	13-Jun-14	P		+12	Unit 2 Large Bore Pipe Supports started on June 13th, 2014
97	2CCCT135XX110	Start concrete fill of Nuclear Island structural modules CA01 and CA02 for Unit 2	3-Apr-14	28-Feb-16			+22	
99	POWXXXXPSCM709	Refueling Machine Fabricator Notice to Contractor of Satisfactory Completion of Factory Acceptance Test - Unit 2	30-Nov-13	30-Nov-14			+12	Delay due to schedule refinement and schedule re-sequencing.
100	POWXXXXPSCM710	Deliver Reactor Vessel Internals to Port of Export - Unit 2	31-Jan-14	28-Feb-15			+13	Delay due to subsequent delay in predecessor schedule activities.
101	2CMCT205XX020	Set Unit 2 Containment Vessel #3	24-Apr-14	6-Jan-16		0.00	+21	Sureduce activities.
102	DOM/VVVDCCN711	Steam Generator - Contractor Acceptance of Equipment at Port of	21 1.4 12	31 Oct 14			105	Delay due to subsequent delay in predecessor
102	POWXXXXPSCM711	Entry - Unit 2 Pressurizer Fabricator Notice to	31-Jul-13	31-Oct-14			+15	schedule activities.
104	POWXXXXPSCM713	Contractor of Satisfactory Completion of Hydrotest - Unit 3	31-Mar-14	30-Sep-14			+6	Delay due to subsequent delay in predecessor schedule activities.
105	POWXXXXPSCM714	Polar Crane - Shipment of Equipment to Site - Unit 2	31-Jan-14	31-Jul-15			+18	Delay due to schedule refinement and schedule re-sequencing.
107	2CMCT100RX130	Set Unit 2 Reactor Vessel	23-Jun-14	16-Mar-16			+21	
108	POWXXXXPSCM715	Steam Generator Fabricator Notice to Contractor of Completion of 2nd Channel Head to Tubesheet Assembly Welding - Unit 3	31-Dec-13	30-Nov-14			+11	Delay due to subsequent delay in predecessor schedule activities.
100		Reactor Coolant Pump Fabricator Notice to Contractor of Final Stator						Delay associated with supplier design changes and subsequent delay in predecessor schedule
109	POWXXXXPSCM716	Assembly Completion - Unit 3  Reactor Coolant Pump - Shipment of	31-Aug-14	31-Mar-15	-		+7	activities  Delay associated with supplier design changes
110	POWXXXXPSCM717	Equipment to Site (2 Reactor Coolant Pumps) - Unit 2	31-Oct-13	31-Dec-15			+26	and subsequent delay in predecessor schedule activities
112	2CMCT084SG127	Set Unit 2 Steam Generator	23-Oct-14	16-May-16			+19	ALLEGA CONTRACTOR
114	P3WXXXXPSCM348	Complete Unit 3 Steam Generator Hydrotest at fabricator	28-Feb-14	28-Feb-15		4	+12	Delay due to schedule refinement and schedule re-sequencing.
116	2CMCT118RC135	Set Unit 2 Pressurizer Vessel	16-May-14	30-Mar-16			+22	
		Reactor Coolant Pump Fabricator Notice to Contractor of Satisfactory Completion of Factory Acceptance Test			Ja-r			Delay associated with supplier design changes and subsequent delay in predecessor schedule
117	POWXXXXPSCM720	- Unit 3	28-Feb-15	30-Sep-16			+19	activities
118	POWXXXXPSCM721	Deliver Reactor Vessel Internals to Port of Export - Unit 3 Main Transformers Fabricator Issue PO	30-Jun-15	28-Feb-16			+8	Delay due to subsequent delay in predecessor schedule activities.
119	POWXXXXPSCM722	for Material - Unit 3	28-Feb-15	2-Feb-15				
120	2CMCT118RN195	Complete welding of Unit 2 Passive Residual Heat Removal System piping Steam Generator - Contractor	5-Feb-15	19-Aug-16			+18	
121	POWXXXXPSCM723	Acceptance of Equipment at Port of Entry - Unit 3	30-Apr-15	30-Nov-15			+7	Delay due to subsequent delay in predecessor schedule activities.
122	POWXXXXPSCM724	Refueling Machine - Shipment of Equipment to Site - Unit 3	28-Feb-15	6-Nov-15			+9	Delay due to schedule refinement and schedule re-sequencing.
123	2CMCT239MH130	Set Unit 2 Polar Crane	9-Jan-15	14-Sep-16			+20	

## BLRA Milestone Tracking Accelerated Schedule - U2 COD: 05-Dec-18

	Primavara Activity ID	Milestone Description	Reset Milestone Date	Month End Milestone Date	New Date	Actual Completion Date	Delta Months from Reset Milestone Date	Internal Notes
124	POWXXXXPSCM725	Reactor Coolant Pumps - Shipment of Equipment to Site - Unit 3	30-Jun-15	31-Oct-16			+16	Delay associated with supplier design changes and subsequent delay in predecessor schedule activities
125	P0WXXXXPSCM726	Main Transformers Ready to Ship - Unit 3	31-Jul-15	31-May-15			-2	
126	POWXXXXPSCM727	Spent Fuel Storage Rack - Shipment of Last Rack Module - Unit 3	31-Jul-14	15-Sep-14			+2	
127	2CEAU066XX1145	Start electrical cable pulling in Unit 2 Auxillary Building	14-Aug-13	16-Jun-16			+34	
128	2VSMILPM00052	Complete Unit 2 Reactor Coolant System cold hydro	22-Jan-16	30-Aug-17			+19	
129	2VSIDPT00458	Activate class 1E DC power in Unit 2 Auxilary Building.	15-Mar-15	5-Dec-16			+21	
130	2VSMILPM00076	Complete Unit 2 hot functional test.	3-May-16	31-Dec-17			+19	
131	3CMCT205XX020	Install Unit 3 ring 3 for containment vessel  Load Unit 2 nuclear fuel	25-Aug-15	14-Jul-16			+11	
132	2VSCSFLT1235	Load Unit 2 nuclear fuel	15-Sep-16	4-Jun-18			+21	
133	C1009TN072	Unit 2 Substantial Completion	15-Mar-17	5-Dec-18			+21	
134	3CMCT100RX130	Set Unit 3 Reactor Vessel	22-Oct-15	20-Mar-17			+17	
135	3CMCT084SG127	Set Unit 3 Steam Generator #2	25-Feb-16	18-Jul-17			+17	
136	3CMCT118RC135	Set Unit 3 Pressurizer Vessel	16-Jul-15	3-Apr-17	6.20		+21	
137	3CMCT118RN195	Complete welding of Unit 3 Passive Residual Heat Removal System piping	16-Jun-16	14-Nov-17			+17	
138	3CMCT239MH130	Set Unit 3 polar crane	9-May-16	15-Sep-17		and her lan	+16	
139	3CCTB254BL970	Start Unit 3 Shield Building roof slab rebar placement	26-May-16	14-Feb-17			+9	
133	3CC182348C370	Start Unit 3 Auxiliary Building electrical	ZO-IVIAY-10	14-L6D-T1	-		+9	
140	3CEAU066XX1145	cable pulling	7-Nov-14	8-Sep-17			+34	are stored
141	3VSIDPT00458	Activate Unit 3 Auxiliary Building class 1E DC power	15-May-16	22-Apr-18			+23	
142	3VSMILPM00052	Complete Unit 3 Reactor Coolant System cold hydro	22-Mar-17	30-Jan-19	-		+22	Name and the same of the same
143	3VSMILPM00076	Complete Unit 3 hot functional test	3-Jul-17	30-May-19			+22	
144	3VSCSFLT1235	Complete Unit 3 nuclear fuel load	15-Nov-17	22-Nov-19	_	2017-2001	+24	
145	3VSCS100PP340	Begin Unit 3 full power operation	8-Apr-18	7-May-20			+24	
146	3VSCSPTHHR110	Unit 3 Substantial Completion	15-May-18	7-May-20 7-Jun-20			+25	
210	Trocor Hillitzto	o o outoturnur compretion	13-141dy-10	7-3011-20	-	_	+25	-

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## Impacted/Partially Accelerated Schedule - U2 COD: 13-Jun-19

7/21/2014

Current Date is calculated using a schedule data date of:



## Target Dates Based on ECS Integration Baseline.

	Target Dates Based on ECS Integration Baseline.		Current Date	MS Type
1	Act Description  COL Approval	Act ID  2CCNINBMXX000	3/30/2012 A	F
2	Start Turbine Bldg Basemat - EL 82-9	2CCTB082BL1012	The state of the s	S
3	[\$PM\$] Place Nuclear Island Basemat Concrete (FNC) - Unit 2	2CCNINBMXX120	8/20/2012 A	-
4	Lift & Set [CV] (CR10) - EL 66'6 (450 Tons)		3/9/2013 A	S
5		2ECNINBMXX012	4/3/2013 A	S
	[-BLRA-] Set Containment Vessel Bottom Head on 16 Supports - EL 66'6" (900 Tons)	2CMCT066XX200	5/22/2013 A	S
6	[-BLRA-] Set module CA04 for Unit 2	2CCCT071XX110	9/27/2013 A	S
7	[MM] Lift/ Set & Align CA20 Structural Module On Basemat - EL 66'6 (1200 Tons) (PRHA)	2CCAU066XX312	5/9/2014 A	S
8	[MM] Lift/ Set/ Align CA05 (CVS/Access Tunnel/PXS-B Walls Structural Module w/ Floor) - EL 80'6 (65 Ton)	2CCCT080XX110	11/26/14	S
9	[MM] All Condensers Set - Complete	2CMTBXXXCD8724	12/12/2013 A	-
10	[-BLRA-] [\$PM\$] Set Containment Vessel (CV) Ring 1 - EL 104'-1 1/2"	2CMCT104XX020	6/3/2014 A	S
11		2CCTB100BL866	3/4/15	S
12	[MM] Lift/ Set/ Align CA01 (Steam Generator & Refueling Canal Module) - EL 83'0 (610 Ton) - Cont Bldg (PRHA)	2CCCT080XX130	3/20/15	S
13	[MM] Start VCS Unit 2 Shield Building Construction at Horizontal Transition Pieces - EL 100'	2CCSB100XX180	1/12/15	S
14	[-BLRA-] Lift/ Set/ Align CA03 (IRWST/ Southwest Walls M Structural Module - EL 96'0	2CCCT107XX017	10/27/15	S
15	[MM] Lift/ Set/ Align CA02 (Structural Module IRWST/ Pressurizer Wall M Module) - EL 94'	2CSCT107XX020	9/10/15	S
16	[MM] Set [CV] Ring 2 Including Walkway - Horizontal Circular Tray & Piping - EL 155'-0 3/8"	2CPCT155XX020	11/2/15	S
17	[MM] Start U2 Shield Building Horizontal Transition Piece Installation - EL 146'10"	2CSSB147XX180	9/1/15	S
18	[MM] TG Pedestal: Concrete Cure Complete	2CCTBXXXMT598	1/13/15	F
19	[-BLRA-] Lift/ Set & Align Reactor Vessel - EL 100' (224 Tons) (From Horizontal to Vertical Setting)	2CMCT100RX130	5/13/16	S
20	[-BLRA-] Set Containment Vessel Ring 3 - EL 205'-11 7/8"	2CMCT205XX020	3/2/16	S
21	[\$PM\$] HP Turbine Lower Casings - Set and Contact Checks	2CMTB170MT180	12/3/15	S
22	[MM] Initial Energization Start (RAT A&B) (IE)	2VSMILPM00020	3/3/17	S
23	[MM] All Steel Complete for TB Bldg Unit 2	2CSTB254BL733	1/27/17	F
24	[MM] U2 - CBI Services Lift/Set/Align and Tack Weld Containment Vessel Top Head/ EI 244'-2 1/2" (CBIsvcs CO2	8 C1773MV504-2	1/16/17	S
25	[MM] HP Turbine - 1st Set Rotor	2CMTB170MT1036	8/15/16	S
26	[MM] U2 Shield Building Vertical Int/Ext Shield Wall Panel Construction Complete - EL 248'-6 1/2"	2CSSB239XX180	7/13/17	E
27	[MM] Secondary Hydro Test Window - Start	2VSMILPM10700	5/12/17	S
28	[MM] Main Control Room Ready for Testing	2VSMILPT00364	6/26/17	S
29	[MM] Start Lube Oil Flush for Turbine & Generator	2CMTB170MT720	2/3/17	S
30	[MM] Start Lift/ Set U2 Shield Building Roof	2CSSB264SS180	2/5/18	S
31	[MM] Start Lift/ Set CB20 - PCS Tank Module (PCCWST) on SB Roof - EL 293'9	2CSSB293CB180	3/8/18	S
32	[MM] Fill & Vent RCS (NSSS)	2VSRXPM125	11/13/17	S
33	[MM] BOP - Turbine on Turning Gear	2VSMILPM00098	10/17/17	S
34	[MM] BOP - Condenser Vacuum / Perform Helium Test / Repair Leaks	2VSMILPM10880	10/23/17	S
35	[MM] Cold Hydro Test Window - Start	2VSMILPM00050	1/12/18	S
36	[MM] Pre-Core HFT - Start	2VSMILPM00065	3/29/18	S
37	[MM] CPT / ILRT Test- Start	2VSMILPM00045	8/20/18	s
38	[MM] Receive 103g Finding from NRC	2VSMILPM00031a	12/4/18	F
39	[MM] Fuel Load - Start (Mode 6)	2VSMILPM10810	12/11/18	5
40	[MM] Declare U2 Substantial Completion	2VSCSPTHHR110	6/13/19	F

## V.C. Summer Unit 2 Project Key Dates Overview

## Accelerated Schedule - U2 COD: 5-Dec-18

Current Date is calculated using a schedule data date of:

7/14/2014



## Target Dates Based on ECS Integration Baseline.

	Target Dates Based on ECS Integration Baseline.  Act Description	Act ID	Current Date	MS Type
1		2CCNINBMXX000	3/30/2012 A	F
2	Start Turbine Bldg Basemat - EL 82-9	2CCTB082BL1012	8/20/2012 A	s
3	[\$PM\$] Place Nuclear Island Basemat Concrete (FNC) - Unit 2	2CCNINBMXX120	3/9/2013 A	s
4	Lift & Set [CV] (CR10) - EL 66'6 (450 Tons)	2ECNINBMXX012	4/3/2013 A	s
5	[-BLRA-] Set Containment Vessel Bottom Head on 16 Supports - EL 66'6" (900 Tons)	2CMCT066XX200	5/22/2013 A	s
6	[-BLRA-] Set module CA04 for Unit 2	2CCCT071XX110	9/27/2013 A	s
7	[MM] Lift/ Set & Align CA20 Structural Module On Basemat - EL 66'6 (1200 Tons) (PRHA)	2CCAU066XX312	5/9/2014 A	s
8	[MM] Lift/ Set/ Align CA05 (CVS/Access Tunnel/PXS-B Walls Structural Module w/ Floor) - EL 80'6 (65 Ton)	2CCCT080XX110	11/20/14	s
9	[MM] All Condensers Set - Complete	2CMTBXXXCD8724	12/12/2013 A	F
10	[-BLRA-] [\$PM\$] Set Containment Vessel (CV) Ring 1 - EL 104'-1 1/2"	2CMCT104XX020	6/3/2014 A	S
11	[\$PM\$] Place Concrete for Basemat - 1st Bay-EL100_subArea13 (Mix B2H)	2CCTB100BL866	3/2/15	s
12	[MM] Lift/ Set/ Align CA01 (Steam Generator & Refueling Canal Module) - EL 83'0 (610 Ton) - Cont Bldg (PRHA)	2CCCT080XX130	3/17/15	S
13	[MM] Start VCS Unit 2 Shield Building Construction at Horizontal Transition Pieces - EL 100'	2CCSB100XX180	3/11/15	S
14	[-BLRA-] Lift/ Set/ Align CA03 (IRWST/ Southwest Walls M Structural Module - EL 96'0	2CCCT107XX017	8/28/15	S
15	[MM] Lift/ Set/ Align CA02 (Structural Module IRWST/ Pressurizer Wall M Module) - EL 94'	2CSCT107XX020	7/21/15	S
16	[MM] Set [CV] Ring 2 Including Walkway - Horizontal Circular Tray & Piping - EL 155'-0 3/8"	2CPCT155XX020	9/3/15	S
17	[MM] Start U2 Shield Building Horizontal Transition Piece Installation - EL 146'10"	2CSSB147XX180	9/18/15	S
18	[MM] TG Pedestal: Concrete Cure Complete	2CCTBXXXMT598	1/6/15	F
19	[-BLRA-] Lift/ Set & Align Reactor Vessel - EL 100' (224 Tons) (From Horizontal to Vertical Setting)	2CMCT100RX130	3/16/16	S
20	[-BLRA-] Set Containment Vessel Ring 3 - EL 205'-11 7/8"	2CMCT205XX020	1/6/16	S
21	[\$PM\$] HP Turbine Lower Casings - Set and Contact Checks	2CMTB170MT180	11/24/15	S
22	[MM] Initial Energization Start (RAT A&B) (IE)	2VSMILPM00020	10/14/16	S
23	[MM] All Steel Complete for TB Bldg Unit 2	2CSTB254BL733	11/7/16	F
24	[MM] U2 - CBI Services Lift/Set/Align and Tack Weld Containment Vessel Top Head/ El 244'-2 1/2" (CBIsvcs CO2	28 C1773MV504-2	11/10/16	S
25	[MM] HP Turbine - 1st Set Rotor	2CMTB170MT1036	5/27/16	S
26	[MM] U2 Shield Building Vertical Int/Ext Shield Wall Panel Construction Complete - EL 248'-6 1/2"	2CSSB239XX180	12/29/16	F
27	[MM] Secondary Hydro Test Window - Start	2VSMILPM10700	12/26/16	S
28	[MM] Main Control Room Ready for Testing	2VSMILPT00364	2/9/17	S
29	[MM] Start Lube Oil Flush for Turbine & Generator	2CMTB170MT720	11/15/16	S
30	[MM] Start Lift/ Set U2 Shield Building Roof	2CSSB264SS180	7/21/17	S
31	[MM] Start Lift/ Set CB20 - PCS Tank Module (PCCWST) on SB Roof - EL 293'9	2CSSB293CB180	8/23/17	S
32	[MM] Fill & Vent RCS (NSSS)	2VSRXPM125	6/15/17	5
33	[MM] BOP - Turbine on Turning Gear	2V5MILPM00098	8/1/17	5
34	[MM] BOP - Condenser Vacuum / Perform Helium Test / Repair Leaks	2VSMILPM10880	8/7/17	5
35	[MM] Cold Hydro Test Window - Start	2VSMILPM00050	8/14/17	5
36	[MM] Pre-Core HFT - Start	2VSMILPM00065	10/29/17	5
37	[MM] CPT / ILRT Test- Start	2VSMILPM00045	2/8/18	5
38	[MM] Receive 103g Finding from NRC	2VSMILPM00031a	5/28/18	F
39	[MM] Fuel Load - Start (Mode 6)	2VSMILPM10810	6/4/18	5
40	[MM] Declare U2 Substantial Completion	2VSCSPTHHR110	12/5/18	1

"DRAFT Information for Internal Consortium Discussion Purposes ONLY" "Westinghouse and Stone Webster Proprietary and Confidential"

## Unit 3 COD 13-Jun-20

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Current Date is calculated using a schedule data date of: 7/21/2014

## Target Dates Based on ECS Integration Baseline.

	Act Description	Act ID	Current Date	MS Type
1	COL Approval	3CCNINBMXX000	3/30/2012 A	F
2	[MM] Start Turbine Bldg Basemat - EL 82-9	3CCTB082BL1012	9/22/14	S
3	[\$PM\$] Place Nuclear Island Basemat Concrete (FNC) - Unit 2	3CCNINBMXX120	3/9/2013 A	s
4	[MM] CR10 Final Torque of Bolts	3CSSB066XX050	3/28/2014 A	s
5	[MM] Set Containment Vessel Bottom Head (CVBH) on 16 Supports- EL 66'6" (900 Tons)	3CMCT071XX200	5/21/14 A	S
6	[MM] Lift/ Set & Align CA04 (Reactor Vessel Cavity Module)- EL 71'6"	3CCCT071XX110	11/25/14	S
7	[MM] Lift/ Set & Align CA20 Structural Module On Basemat - EL 66'6 (1200 Tons)	3CCAU066XX312	9/22/15	s
8	[MM] Lift/ Set/ Align CA05 (CVS/Access Tunnel/PXS-B Walls Structural Module w/ Floor)-EL 80'6 (65 Ton)	3CCCT080XX110	4/21/15	s
9	[MM] All Condensers Set - Complete	3CMTBXXXCD8724	6/5/15	F
10	[MM] Set Containment Vessel (CV) Ring 1- El 104'-1 1/2"	3CMCT104XX020	4/14/15	s
11	[MM] Place / Cure & Remove Forms for Basemat Concrete - EL 100 Area 13 (1st Bay)	3CCTB100BL866	7/10/15	s
12	[MM] Lift/ Set/ Align CA01 (Steam Generator & Refueling Canal Module)- El 80'6 (610 Ton)	3CCCT080XX130	2/2/16	s
13	[MM] Start VCS Unit 3 Shield Building Construction at Horizontal Transition Pieces EL 100'	3CCSB100XX180	1/3/16	s
14	[MM] Lift/ Set & Align CA03 (IRWST/ Southwest Walls M Structural Module- El 96'-0	3CCCT107XX017	5/5/16	s
15	[\$PM\$] Lift/ Set & Align CA02 (Structural Module IRWST/ Pressurizer Wall M Module)- El 94'0	3CCCT107XX020	4/19/16	S
16	[MM] Set [CV] Ring 2 Including Walkway- Horizontal Circular Tray and Piping- El 155'-0 3/8"	3CPCT155XX020	5/10/16	S
17	[MM] Start U3 Shield Building Horizontal Transition Piece Installation at EL 146'10"	3CSSB147XX180	6/29/16	S
18	[MM] TG Pedestal: Concrete Cure Complete	3CCTBXXXMT598	3/2/16	F
19	[-BLRA-] Lift/ Set & Align Reactor Vessel- El 100' (224 Tons) (From Horizontal to Vertical Setting)	3CMCT100RX130	1/3/17	S
20	[-BLRA-] Set Containment Vessel Ring 3- El 205'-11 7/8"	3CMCT205XX020	7/14/16	S
21	[MM] HP Turbine Lower Casings - Set and Contact Checks	3CMTB170MT180	12/19/16	s
22	[MM] Initial Energization Start (RAT A&B) (IE)	3VSMILPM00020	12/7/17	S
23	[MM] All Steel Complete for TB Bldg Unit 3	3CSTB254BL733	4/20/17	F
24	[MM] U3 - Lift/Set/Align and Tack Weld Containment Vessel Top Head/ El 244'-2 1/2" (CBIsvcs C05720)	C1773MV504-3	6/28/17	S
25	[\$PM\$] HP Turbine - 1st Set Rotor	3CMTB170MT1031	4/17/17	S
26	[MM] U3 Shield Building Vertical Int/Ext Shield Wall Panel Construction Complete - EL 248'-6 1/2"	3CSSB239XX180	6/23/18	F
27	[MM] Secondary Hydro Test Window - Start	3VSMILPM10700	5/12/18	S
28	[MM] Main Control Room Ready for Testing	3VSMILPT00364	7/7/18	S
29	[MM] Start Lube Oil Flush for Turbine & Generator	3CMTB170MT720	10/6/17	S
30	[MM] Start Lift/ Set U3 Shield Building Roof	3CSSB264SS180	1/16/19	S
31	[MM] Start Lift/ Set CB20 - PCS Tank Module (PCCWST) on SB Roof at EL 293'9	3CSSB289CB180	2/18/19	S
32	[MM] Fill & Vent RCS	3VSRXPM125	11/17/18	S
33	[MM] BOP - Turbine on Turning Gear	3VSMILPM00098	10/24/18	S
34	[MM] BOP - Condenser Vacuum / Perform Helium Test / Repair Leaks	3VSMILPM10880	10/24/18	S
35	[MM] Cold Hydro Test Window - Start	3VSMILPM00050	1/21/19	S
36	[MM] Pre-Core HFT - Start	3VSMILPM00065	4/7/19	S
37	[MM] CPT / ILRT Test- Start	3VSMILPM00045	8/1/19	5
38	[MM] Receive 103g Finding from NRC	3VSMILPM00031a	12/3/19	F
39	[MM] Fuel Load - Start (Mode 6)	3VSMILPM10810	12/11/19	5
40	[-BLRA-] [MM] Declare U3 Substantial Completion	3VSCSPTHHR110	6/14/20	F

"DRAFT Information for Internal Consortium Discussion Purposes ONLY"
"Westinghouse and Stone Webster Proprietary and Confidential"

## Wrap-up

The Consortium looks forward to further review of the IPS and dialogue with the Owner in the coming weeks.



From:

To: BROWNE, KENNETH JEROME; COLEMAN, JONATHAN M; HYDRICK, BERNARD JR;

STEFFY, RODNEY E JR CC: TORRES, ALAND

Subject: FW: 2014-08-25 IPS Review-VCS.pdf Attachments: 2014-08-25 IPS Review-VCS.pdf

From: Tibbetts, Aaron [mailto:aaron.tibbetts@cbi.com]

Sent: Monday, August 25, 2014 9:49 AM

To: YOUNG, KYLE MATTHEW; Elam, Terry; Cazallet, Lisa Anne (cazallela@westinghouse.com); Magmarrelli, Dan

(magnardl@westinghouse.com)

Subject: 2014-08-25 IPS Review-VCS.pdf

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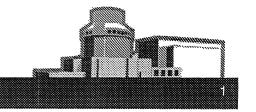
## Presentation form this morning.

This e-mail and any attached files may contain CB&I (or its affiliates) confidential and privileged information. This information is protected by law and/or agreements between CB&I (or its affiliates) and either you, your employer or any contract provider with which you or your employer are associated. If you are not an intended recipient, please contact the sender by reply e-mail and delete all copies of this e-mail; further, you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

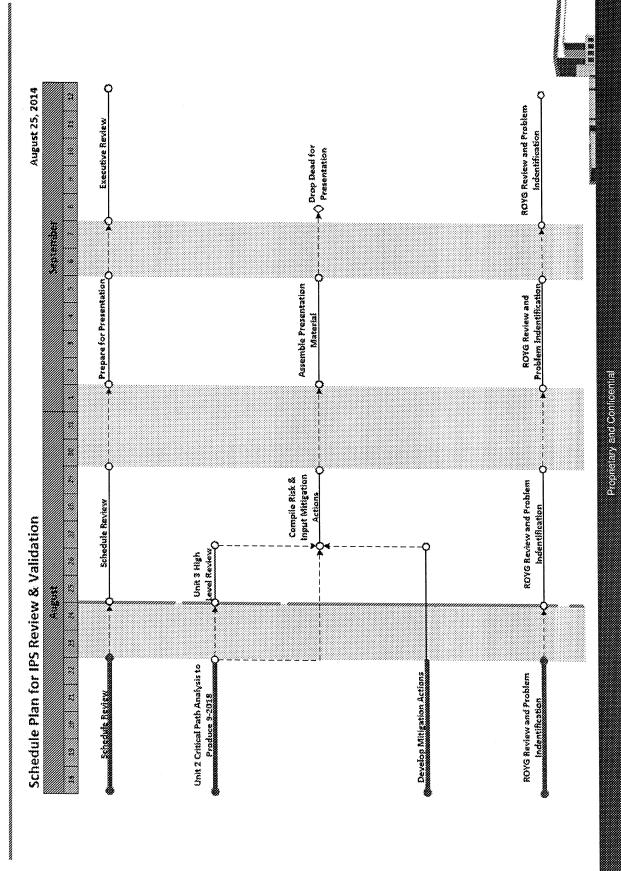




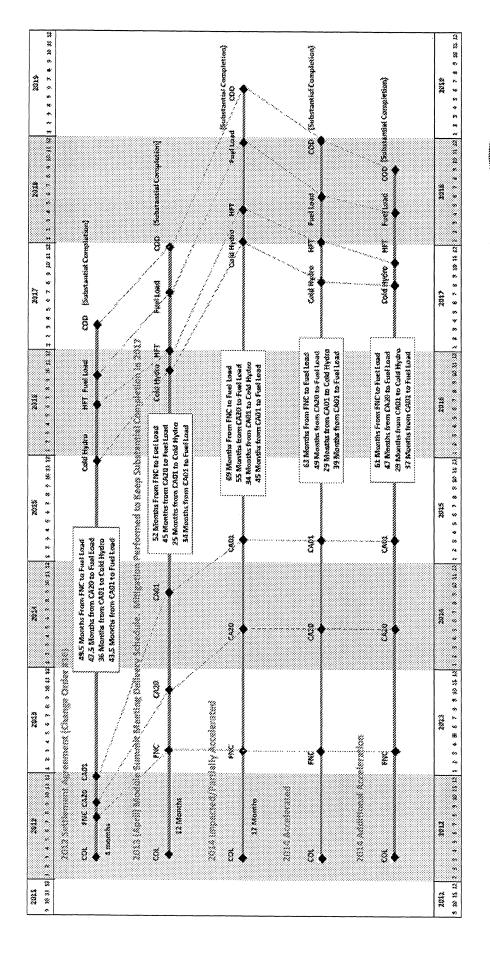
## VC Summer Integrated Project Schedule Review & Validation August 25, 2014



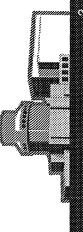
## Data Torward



## DS History







Proprietary and Confidential

# ELEGTRONICALLY-FILED - 2018 December 5 5:11 PM - SCPSC - Docket # 2017-370-E - Page 71 of 118

Act Beschöten.	Act 10	Han 2019 Substantial Completion	Dec-2018 Sebetantial Completion	Sep. 2018 Substantist Completion	Var Sens 2019 Dec 2018 (Months)	Var Der 2018 Sep 2018 (Months)	Var 1007-2019 Sep- 2018 (Months)
1 COL Appendal	ZCERNNBRAKKKODO	F 3/30/2812.4					
2 Kraci Turbine king kavemat. El 22.9	20CTB082861012	s &iratoria					
3 (SPMS) Place Nuclear Ward Baremat Concrete (PMC) - text 2	ZCCRIMBINANCED	S 3/5/2013.A					-
4 Life's Ser (CV) (CRIO) - El 66'S (4'SO Tons)	SECNIKEMONOTE.	\$ 4/3/2013 A					
5 [BURA] Set Contolnment Vessel Antom Head on 18 Supports - EL 66'8' (900 Tana)	ZCMCTD66xxzco	\$ <b>5/22/2013</b> A					***************************************
6 [BRA4] Set module Cally for their 2	SCCCT071KX110	\$ \$/27/3033A					
7 [MM] LIK Sec & Align CA20 Structural Module On Besernar - El 66'6 (1200 Tons) (FRIM)	N ICCALIOSOMENIE	S 5/3/2014 A					
8 Innai Libri Sect Align CARS (CVS) Access Tunnel PXS. Bibails Bructural Modula w. Frion - 2CC. TORCXXII B	1 - DOCCTORCKYALD	5 33/28/34	11/20/14	\$2,623,03	3	2.5	**
9 (NAA) All Condensins Sec Complete	TOMPOKKKED8724	8. 12/12/2013.8					
10 [BIRA] SPMS] Set Containment Versel Coll ling 1 - El 104' 2 1/2"	2CNICT1D4KK020	5 6/3/3014 A					
11 (SPNS) Place Concrete to Beseinst - Israbapetion, subarrais (Min 52H)		S 3/4/15	3/3/15	3/9/15	63.	£ 04	-6.2
12 [MIM] LIM Sect Align Chill (Shoom Generator & Retueling Canal Module) - EL 83 is felt to 2000 (1940) Alian		\$ \$1000 S	3/11/13	81,8715	ťo	45	5.0
17 inini sint VII Unit I inini Buildry Construction of Horizontal Transition Phaess- El 104 2015/8103781499		S: 1/12/15	1/13/13	\$1/01/#	S S	87	41.9
14 [GLRA] 1th/ Ser/ Algn CAGS (IRWST) Southwest Walls in Structural Module - El 96 il		\$ 10,33/35	8/28/15	8/18/15	3.0	8.3	\$73
18 (MAM) URV SOV, Algr CAD2 (Structural Aradula (RVAST) Pressurcies (Main Brandule) - El SA JUSCIIO XXXIIO		Strome S	2/28/15	7/1/15	Z'X	63	83
16 [MM] Set [CV] Bing 2 Including Waltering - Horisonthi Circular Tray & Mining - EL 155'-10 1/M 2CRCTISSKAPPO		5 10203	9/3/15	\$1,83,78	2.0	\$0	2.5
17 (Nith) shar Uz Shend Building Horizantai Transition frece installation - El 14610"	2CSSE147kX180	5 973,715	9/16/15	10/5/15	\$\$.	99	4.5
18 (NAM) TS: Prodestal: Cantrats: Cure Campbete.	2CCTBXXXN/TS98	F 1/13/15	1/6/15	1(33)15	6.2	4.0	48.5
19 [-EURA-] LIP, Set & Aden Rasotor Vessel-Et. 1821 (114 Tons) Prom Borachies to Vertical Lithriften Rasotor		5.13/16	3/36/36	3/8/76	कंद	F 80	સ
28 [FRIRA] See Compainment Verse Ring 3 : El 205'41 7/8"		5 3/2/16	276/16	\$1,93723	\$.	8.7	15 64
21 [SPAMS] NA Turking Lower Children - Set and Coppact Childre	20%18370647180	\$ 12/3/15	11/24/15	12/18/15	8.0	* ₩ ₩	Ę.
22 [Wiki] british Energjantian Start (Raf. 1828) [IE]		5 &9,23	10/14/15	31/25/16	3/4	74 14	¥.
23. [Mind] All Street Complete for TB Blids trick 2.		f 123,13	3177716	91/03/23		£ 35	4.5
34. [MAN] US - CB Services UR1/Set/Angn and Tack Weld Containment Vresof Top Hend/ El 24: C1773AN450A-2		S 1/16/17	11/10/15	10/3/16	tz:	٤٦	in m
25 [Kirk] 11P Turking - 1 it Soft Rotor	2034183708871038	S 8/15/16	5727716	47,712,72	3.6	-3.8	8.0
26 (MM) U2 Shield Building Verts of IntiCit Shield Wolf Fanel Construction Complete - EL 246 2058E2390X199		F 713/17	12/29/36	1,18,17	#(S)	87	\$. \$.
27 (MiM) Secondary Hydon Test Window - Stain	TVSAMENTIONS	S 5,12/17	12/26/16	1,27/17	<del>\$</del>	. g. %	જ. જ
28 [hear] Main Commi Rand Ready for Texting	2VSNALPTOSSE4	5 6/26/17	2,19,017	*****	\$.5	3.5	<b>新</b>
29 [Mini] Start Lides Oil Flush for Turbins & Generatur	ZCMTB170MT720	5 2,3,17	14/15/16	12/19/16	3.5	4.5	\$4. F.
38 (RWA) Shart Lift / Set UZ-sheigt Building Rood	2C55626435180	S 2/5/18	27,227,17	8,4/17	٠ (۱)	50	£.3
31 (MM) star Litt/ Set CRig - PCS Tank Module (PCCWST) on SB Roof - EL 1939.	Ç,	5 3/8/18	\$723/11	8/6/17	<b>6.5</b>	\$.O.	4.0
32 THANS THE R PER PER PERSON	2VSBXPM1125	5 13/13/17	6/15/17	5/21/17	3,8	ry 12	, A.
33 [anh]; 50% - Turbine on Purning Gear.	ZVJAMEPNADBDEN	S 20/37/37	8/1/17	6,21,13	.57	1.3	3.3
34. Inini BOP · Candensar Vacuum (Perform Helium Teat / Rapair Laaka.		5 19/23/17	\$77,017	5,25/17	ž.	\$7	S) M
35 (WAM) Cold Hydro Teat Whiden - Start	ZVSAMENADOSO 6	5 1/12/18	8/13/17	8/2/8/17	8.3	· <b>4</b>	्रक् इंदर
36 (Make) Pre-Core HET Smit	EVSKAL PANCOOKS	S. 4079/38	10/29/17	30/38/17	5.6	\$10	, S.
37 (MM) CPT / CAT Test-Stail	S SPECIONAL PRODUCTS	87,337,13	37.87.78	81%17	6.3	k o	7,0
38 (Mak) Arceive 1933 Finding from NAC	2VSWHERNOCOSIS F	12/4/38	5/18/18	4.25/18	6.3	2.1	7.3 mm
39 [kalar] have knash Liner knash Bi	S. STANFORMS S	12/11/18	5/4/18	5/3/18	5.3	1.1	7.3
40 [kew] Decisire UZ Substantial Completions	200CSPTHHRISTID	5 6/13/19	12/2/16	8732/18	155 VK	233	, 10. 10.

Acceleration Review - Major Milestones

## **Acceleration Review - Work Shifts**

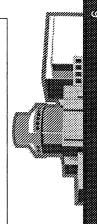
Ħ	Activity ID	Activity Name		88	\$1907	Fires	Csiendar	Total Float	Law Start	Este Finish
i	Mark-Brideing	Related								
2	2073333337593318	(FP3-03) for FE. FIRE PROTECTION SYS CON	oble - Constantion Wakdown & Turrover to Component Test Group	3:	95-Sep-15	30-Sep-16	DAP - 5-188 (2 Shing)	33	21-Oct-15	26-00-16
3	2C7XXXXXFF9829	(FPS-03) for FE - Construction Complete Punchi	st transe Prior to Turnover to Component Test Group Prior to Turnover te Component Test Skrago	3	39-56p-16	13-Sep-16	DAP - 5-10's (2 Shitts)	33	28 02-16	28 Oct 16
ş	2CTXXXXXXPL0220	(PLS-02) Construction Complete Punchilial Issues	Prior to Turnover te Composient Test Group				DAP - 5-18'S (2 Shifts)	2	12-Oct-15	15-03-16
`	2CTXXXXXXPL0230	(PLS-82) Construction Turnover to Component To	ist Graup Complete	0	}	18-Oct-16	DAP - 5-16's (2 Shits)	2		15-Od-16
ž	Shield Buildin									
7	2088E1838Y281	: (SPMS) Instell Vertical Transition int/Ext Shield Wa	Pacies Rt Column Line N - BL 10005-1251	3	17-24-15	17-24-15	EAF - 5/10's (2 Shifts)	, .ς	02-365-15	10-38-15
?	2058B1038Y305	[SPM\$] install Vertical Transition int/Ext Shield Wa	Panelst Calum Line O - EL 1036-125	. 3	17-33-15	17-36-15	DAP - 5-10% (2 Shifts)	~7	58 32 35	29-34-15
-		Weld Vertical Transition int/Ext Shield Was Planets		1	17-20-15	16-345-15	DAP - 5-10's (2 Shifts)			22-38-15
0	2CSSE100SY383	Weld Vertical Transition int/Ext Shield Wall Panel a	t Caluma Line Q - EL 106% 117	1	17-35-15	18-26-15	DAF - 5-10's (2 Shifts)		22-364 15	22-38-15
·	11 2CTSB1826Y413	NOE Testing for Vertical Transition Panel Welds at	Column Line CI - EL 106'6 117'	3	20-33-15	20-30-35	DAP - 5-10's (2 Shifts)		22-368-35	28-38-15
2:	2CTSE100SY425	NDE Testing for Vertical Transition Pares! Welds at	Cotama Line W - EL 19316-125:	1	20-36-15	20-26-15	DAP - 5-10's (2 Shifts)	3:	22-366 15	23-38-15
3	2038881835Y335	[SPUS] Instal IntExt Sheld Wait Person at Column	(Line N-Q - EL 1335-11376			24-26-15	DAP - 5-18% (2 State)			
4		Works Into Exit Sheets Wast Parties at Column Line N-				28-Jul-15	DAP - 5 10's (2 Shifts)	13	13-Aug-15	19 Aug-15
5.	2C7SB183SY416	NDE Teeling for Panel Wolds at Column Line N-Q			23-34-15		DAP - 5-10'S (2 Shits)			
;	2055B1135Y335	[SPMS] insiss inti-bit Sheat Weil Penal at Column				25-Aug-15				
	2CSSE112SY275	Weld Intrievi Shard Was Panels at Column Line N-					DAP - 5-10's (2 Shifts)			
	2CSSB147XX330	Prep Scield Wall Harkonisi Transition (Please for					DAP - 5-105 (2 Shifts)			
		NOE Testing for Wolds of Column Line N.O. E. 1					DAP - 5-10's (2 Shitts)			
		Spi-Up & Place Controls at Sheld Panels at Colu					DAF - 5-10's (2 Shifts)			
-		Install Extended Thread Spice Rober (Lipsel Bar)					DAP - 5-10% (2 Shifts)			
:	R	INPASS inoted Vertical Transation int/Ext Strick: Wa					DAP - 5-10's (2 Shifts)			
		Wold Vertical Transition InstExt Sheet Wall Panel's		4	84.580-15	10.505.15	D&P . S. 1030 (9 Shows)	17	58-O3-15	82-08-15
		NOE Testing for Vertical Transition Penel Welds of		1	10-880-15	10-500-15	DAP - 5-10's (2 Shifts)	13	02-04:45	88 Oct-15
		Install MS FW Weidment Assembly - Shield Wall F					DAF - 5-10's (2 Shifts)			
	2CSSB124SY311	[SPASE] install Vertical Transition Int/Ext Street Wal					DAP - 5-16's (2 Shifts)			
7		Wold Vertical Transition int Ext Shield Wall Panel a					DAP - 5-10's (2 Shifts)			
_	2025524752375	Institut Extended Thread Solice Follow (Coset Birr)					DAF - 5-10's (2 Shitts)			
-	2015812487269	NOE Testing for Verteen Transition Persel Wolds at					DAP - 5-10's (2 Shifts)			
-		(SPNE) distail MEA Sheed Was Persola at Column					DAF - 5-10's (2 Shists)			
		Weld InvExt Shield Wall Fanots at Column Line N					DAP - 5-10's (2 Shiks)			
-	2CTSB:235Y422	NSIE Testing for Welds at Column Line N-Q - EL 1					DAP - 5 10's (2 Shitts)		20-Nov-15	
-		Set Up a Place Concrete at Sheid Panals at Colu					-DAP - 5-10's (2 Shitts)			
		IsPSSI includintEnt Sheat Wait Penal at Column					DAP - 5-10% (2 Shifts)			
-		Weld Interest Shield Was Penels (III Column Line N	ι Λ. ΕΙ (20% 1998)		19-40-15	27-Arr-15	DAP - 5-10% (2.8h%s)	-85	11-780-15	10-080-15
-		NDE Testing for Worlds at Octom Line N & O - EL	1917/1908		15-Ars: 18	25.477.16	DAP - 5-10% (2 Shifts)	-85	14-000-15	22-Geo.15
-	2CDSB131CC914	South a Piero Coursete at Shield Parcele at Color	endina M.C. El 184 in 188 — III III II III III II I		25.Acr -15	38-A37-18-	DAP - 5-10's (2 Shifts)	-85		
	■ 20C9B117XX029	[TM] Pisce Concrete Shield Wall of Column 7.3-N	68 (1775 - 1329 (Ezst 269)	···».	27-18ay-16	28-May-16	DAF - 5-10% (2 Shifts)	-17 <b>0</b>	23-Spp-15	24-See-15
		41114.	報告系以及Associated Work Stiff Assivities to <b>Support</b> Sept <b>2016</b> S							
			Сक्ष्माहिकार । अध्यापकार्यका अर्थ कार क्ष्माहिकार । हिस्साहिकार व्यक्त इस्ताहिक	-co-to-ca (ci	2.7793	.St. 1.20			<b>\$</b> \$	Grade Corps





## Acceleration Review - Work Shifts

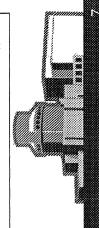
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Contractions of the company of the contraction of	3008	BITTEN	Fermove Forms Sheet Wall or Colores 7.3-14 - EL		હા	<b>∤</b> ····:	37 - JRF-18	DAP - 5-1036 (2.9)	Į)	<b>ન</b>	<b>-{····</b>
COSSISSONTONES   Communication of Communication No. 0. E. 1976 1974 1975   Control of Communication No. 0. E. 1976 1976 1976   Control of Communication No. 0. E. 1976 1976 1976   Control of Communication No. 0. E. 1976 1976 1976   Control of Communication No. 0. E. 1976 1976 1976   Control of Communication No. 0. E. 1976 1976 1976   Control of Control of Communication No. 0. E. 1976 1976 1976   Control of Control	8500 8500 8500 8500 8500 8500 8500 8500	E1350X010	instatt Rebar for Wolf of Column Line 7.3-14 - EL 13	35%- 147"	~	}	31-WF-85	CAP-510's (28)	Ş	}	ļ.::.
Company   Comp	100 N	Erass Year		o Ka C. El 1366 to 1495 (Very Side)			3. Am 15	DAP - 5-10% (2.S.			
2. CTREATMENT OF THE CANADA STANDARD S	208SE	B: 325Y355		- EL 139/6 to 149/6 (West Sta)			31-WC-45	CAP. 5 10'S (28)	* 18g	18 30 Dec 1	
XCMS BROKEN         SERVED STORTED STANDARY PROMED CONTROL LENGT FOR THE ANALYSIS STAN	20TOK	B138SY245	RDE Torang to Instert Chiedd Panal Words or Crab.	malian & Q. El 1995 1498	• • • • •	ķ	27.Jkm.15	DAP. 5-10'S (2.8)	~ 22.0	٠	٠
2.0280 0007070   State of the Control of the Cont	SCOS.	B1392.0198	Set-Up & Peus Cennam at Shield Pands at Color	mi ira 4-0 - E. 136 - 1+5 (Mas Kai)	બ	٠	31 .37	EAP. 9-155 (2.8)	183	÷	<u>٠</u> ٠٠٠
2.5386.087794 MSG Sender Service A. E. 1947-1959. 2.5386.087794 MSG Sender Service A. E. 1947-1959. 2.5386.087794 MSG Sender Sen		BY SOCY368	SPANS, Indian India Shind Was Pancia at Column	Line N in M El sang 1503	5	····	8. ty. 38	5-10's (2		ļ	• • • • • •
201289 1937 1932 1932 1932 1932 1932 1932 1932 1932		EX 508 Y350	: ***	- M. El 1436-1535	:	÷	20 S	DAP- 5-10'S (2.8)	<u>ښ.</u>	٠ <u>:</u>	٠
2.058   1.05	į.	3: 50SY28#	,000		13	ģ	33.50	CAP. 6-13'8 (3'8)	Œ.	}	<u>٠</u> ٠٠٠
20128910702000   Still of Pance Comment Same National Comment National C	-	F150E7355		128 (27, 271(172) at El 153 · AZ 332 in 50 · Ain Body Araba 132	ţ	<i></i> پ	8-00-15	D4P- 5-10's (2.5)	1839	·; · · ·	·
20288 607100 SALIJA E. KARO CONTRAD SANDAN MAI SALIJAM N. EL 1975 4976 60 10 10 10 10 10 10 10 10 10 10 10 10 10	2013E	31205Y283		S. D. Parrick (STL OFM, STS) at EL 158 . AZ 338 in 50 . Am Eldo Arean (M.	····	·	\$ :00 ts	201-2-101 (2 PM)	200	·	
13.000   1.0	3008	\$30000kg	Settler & Page Congres Shart Wall at County	N. E 148 8 350	;···		2013	CAF - 5-10'S (2.8)	i sa		
2012-2018-2019-2019-2019-2019-2019-2019-2019-2019	N.SSE	28 SOS Y582	19744, install IntEst Shad Wal Parals at Column	Line 14. 14. EL 15076 18076	· · · · ·	٠···	31.107.2	24P. 5-101 ES	Ţ.,		A
2015   1985	SCSSB	3:5057395	Word on Ear Shading Parek a Cookin Line M.	N · E. (20% 163%	÷	:	90.00	EAP 5-105 (28)	72	•	
CCERN SOFTWAY   CREEK NORMS   CANADA	SCINE	TI SUNTY SET	NOE Tasking to: Welds at Column Line N. N. B. 1	(508.1636	÷	•••••	G-May: 38	049. 5.108 (2.5)	- - 24	• • • • •	
CCCSB:0007702         CREATION OF CONTROLS FOR THE CONTROL FO	\$CS38	34 555 Y 387	Install & Weld 1"x3" Roof Connection Pictors & Bear	m Sazis to Panels (MB from CBF - EL 1535 - AZ 51 to 159 - AB Asses 334		÷	B 45% 4	EAP. 5-10's (2'S)		٠···	
COSSIBINATION         Seel Lype From Comment of Column Line N. N. E. 1579: 1978 (1978)         17. File No. 16         17. Sharers	2CTSB	33 535 (202	NOE Wast Tasking	to Penas cost than use - El 1895 - Al 31 to 188 - AB Areas Rus			J. May 15	DAP. 5 103 (2.8)	ŝ	••••	
Comparison   Com	20038	335900113	Sel-to a Fece Committe at Sheid Panels at Color	m Line I. N El 150 in 169		÷	5-NOV-76	DAP. 5-103 (2.5)	3	٠	
CORRELATION         Wind sides Sheek was dream from the 8th B. E. 1909-1709.         CORRELATION         14 21 No. 16 10 10 10 10 10 10 10 10 10 10 10 10 10	SCSSE.	350575	[\$PMS] install inter Ohen Was Panels at Column	Ling M. M. EL 16875-17816	٠i		3.0xc 15	CAP- 5103 (2.8)	5 (SES)		;
CONTRINGENCY   Market State   Colored Live N. R. El. 1956   First State   Colored Live N. El. 1956   First State   First State   Colored Live N. El. 1956   First State   F	208SB	N.SSEYST4	Walchield Shirk Was Parata at Criting Line W.	8: El 1535-1794		····	3-Ever 16	D&P. 5-10'8 (2.8)	200	5 22 May 1	
CONSISTINGACIONAL         Solido & Porto Compress di Noval Pression Controlle N. N. El 1976 1976         1 14 1806 76         1 4 1806 76         1 4 1806 76         1 4 1806 76         1 4 1806 76         1 5 18 1806 76         1 7 18 18 1807 76         1 7 18 18 1807 76         1 7 18 18 1807 76         1 7 18 18 1807 76         1 7 18 18 1807 76         1 7 18 18 1807 76         1 7 18 18 1807 76         1 7 18 18 1807 76         1 7 18 18 18 1807 76         1 7 18 18 18 1807 76         1 7 18 18 18 1807 76         1 7 18 18 18 18 1807 76         1 7 18 18 18 18 18 18 18 18 18 18 18 18 18	K.138	X 655 Y 250	NOTE TURNING TO WARDS AS COLUMN LING NO. 18 - EL 1	1586-1784	#	٠···	4 Dec 16	EAP 5 152 (2 S.	ě	٠	٠
CNOBINESTIMATION         NAME INTERFERENCE STANDARD LINEAR LI	SCCSE	NOSCC140	Set lip & Plans Covering of Nixed Powers of Colons	en loom. W. El len in 178	Ku		6-Thus 16	DAP. 5-10'S (2 S)	· · · · · · · · · · · · · · · · · · ·	5 10.45×10	;
2.5.582 PSSS-140 Wach might be water Shaded Navie Break at Column Live N. N. E. 1795-1896	ADSS/CK	R 795Y4CF	ISPANS From Inter Shed Was Pares at Cohum	Line M. M. El 1796 (578	.:. 5		6-288-17	DAP - 5-10% (2.8);		7 20-45F-15	
WEET Transmister Windows of Column Live N. N. B. 1996   1998   1998   1998   1999	3C53B	B 7257410	Welc men shaid Wall Panes at Colora Line No.	N - EL 1788 1896			7-780-7	DAY 9-103 G St	1288	3 E1-A35-16	····
Set Lip a Prace Coursele at Season Panels at Colorent Line N. N. E. 1985 1985   15   25 days 17   25 days 1	NO TREE	R 7957283	NDE Texting for Wishows Column the N. H. B.	(F&E-1828			8-280-17	DAP - 5-10% (2.8)		3. 52. 5. S.	· · · · · ·
2.03881 8657 547   Which interface Sheet Was Perceical Colorers Line N. N. E. 1876-1895   155-200 1	2CCSB	379CO83	Set-Up & Pace Conserva at Sheisid Panels at Colum	mline M.N. E. 175 in 185		····	3-Serv.17	DAP - 5-10% (2.5)		13-56ey-1	;
2.C1SR 885728	SCSSE	BENEVERT	(RPMS) brotok Int Ent Shart Wall Pansis at Column	Line W. M. El 1805-1886	35		7-F80-53	DAP - 5-13'S (S Sh	₹80° - 1.7	24-May-1	••••
2.C.CSBR 660C/1528 Set Lips Prace Company at Swell Praces a Column line N. N El 1956-1007E Set Lips Prace Company at Swell Praces a Column line N. N El 1956-1007E Set Lips Prace Company at Swell Praces a Column line N. N El 1956-2009E SEC SERVACIONE SET SWELLOS PRACES S	SCSSR.	X 855 7401	Word Burket Shoot Wast Panes at Column 1904 M -	M. E. 1828-1935			8-Fab: 17	DAP - 5-1012 (2)		25-58ey-16	
2003Br9000102 Stilling Press General at Swell Peacks at Column Line N. N. El 1909 b 1533	108 108	#855Y238	NOS Tusting for Wedds at Celann Line 18 - 18 - EL 1	958·1888	• • • • •	• • • • •	1.F&\$2.87	DAP - 5-198 (2/8)	73. (3)	1 27.May-10	
2CSB1985Y4CH (RPA9) traces of Coloren Line N. N. E. 1995-2096  2CSB1985Y223 Need referentiation N. E. 1995-2096  2CSB1985CS24 Selective Reference of Coloren Line N. N. E. 1995-2096  2CSB1985CS24 Selective Reference of Coloren Line N. N. E. 1995-2096  2CSB1985CS24 Selective Reference of Coloren Line N. N. E. 1995-2096  2CSB1985CS24 Selective Reference of Coloren Line N. N. E. 1995-2096  2CSB1985CS24 Selective Reference of Coloren Line N. N. E. 1995-2096  2CSB1985CS24 Selective Reference of Coloren Line N. N. E. 1995-2096  2CSB1985CS24 Need Need Need Need Need Need Need Nee	20038	NASCOTAL	Set 1;p. 2. Place Concress at Sheed Parels at Coher	n les N. H El 1987 de 1667			2.Fab 17	D4P. 5-10's (2 Sh	î.	3 17 A85 15	
2008019807289 Wald interferentiation of the No. E. 1985-2036 State of the Character Shaid was broken than N. P. E. 1985-2036 State of the Character Shaid was broken than N. P. E. 1985-2036 State of the Character Shaid was broken than N. P. E. 2036-2136 S	8000 E	\$405X404	RPMS HELD INCER Shed Was Pansk at Column	Line 14 M · E. 1956-2398			1 May 12	DAP - 5-10'8 (2'8)	1.1	27.Jun. 16	
15   STAMS 17   SAANS 17   SAAN	3088B	0823/2880	West on the Sheid Was Pares of Column Live M-	R- El. 1985-8996			5-Mile 17	DAP - S-1435 (25 Sh	\$\$\$) -12	3 28-387-16	••••
20056193000047 Set Up a Porce Genorees at Sheet Presis Column Line M.NE. 1939 of 1239 2005619300047 Set Up a Porce Genorees at Sheet Presis Column Line M.NE. 2039 of 136 20056193000477 Set Up a Porce Genorees at Column Line M.NE. 2039 of 136 2005619300077 Set Up a Porce Genorees at Column Line M.NE. 2039 2195 2005619300077 Set Up a Porce Genorees at Column Line M.NE. 2039 2195 2005619300077 Set Up a Porce Genorees at Column Line M.NE. 2039 2195 2005619300077 Set Up a Porce Genorees at Column Line M.NE. 2039 2195 2005619300077 Set Up a Porce Genorees at Column Line M.NE. 2039 2195 2005619300077 Set Up a Porce Genorees at Column Line M.NE. 2039 2195 2005619300077 Set Up a Porce Genorees at Column Line M.NE. 2039 2195 2005619300077 Set Up a Porce Genorees at Column Line M.NE. 2039 2195 2005619300077 Set Up a Porce Genorees at Column Line M.NE. 2039 2195 2005619300077 Set Up a Porce Genorees at Column Line M.NE. 2039 2195 2005619300077 Set Up a Porce Genorees at Column Line M.NE. 2039 2195 2005619300077 Set Up a Porce Genorees at Column Line M.NE. 2039 2195 2005619300077 Set Up a Porce Genorees at Column Line M.NE. 2039 2195 2005619300077 Set Up a Porce Genorees at Column Line M.NE. 2039 2195 2005619300077 Set Up a Porce Genorees at Column Line M.NE. 2039 2195 2005619300077 Set Up a Porce Genorees at Column Line M.NE. 2039 2195 2005619300077 Set Up a Porce Genorees at Column Line M.NE. 2039 2195 2005619300077 Set Up a Porce Genorees at Column Line M.NE. 2039 2195 2005619300077 Set Up a Porce Genorees at Column Line M.NE. 2039 2195 2005619300077 Set Up a Porce Genorees at Column Line M.NE. 2039 2195 2005619300077 Set Up a Porce Genorees at Column Line M.NE. 2039 2195 2005619300077 Set Up a Porce Genorees at Column Line M.NE. 2039 2195 2005619300077 Set Up a Porce Genorees at Column Line M.NE. 2039 2195 2005619300077 Set Up a Porce Genorees at Column Line M.NE. 2039 2195 2005619300077 Set Up a Porce Genorees at Column Line M.NE. 2039 2195 2005619300077 Set Up a	20.73B	1995Y223	ADE Tasing tor Weds of Column Live N. N. El. 10	386-8136	ië S		3-Mar-17	DAP- 5-10's (2.8")			25-25-32
## SCHEENSTRAND   12   13   14   15   15   15   15   15   15   15	SCOSE	199CO247	Set-Up & Place Concrete at Shield Presis of Column	mine y. N El 1887 to 2087			1. Mar. 1.7	DAP- S-1478 (25 Sh	ASS -1.7	35 48 35 5	27.48.16
17   15 April 2   12   12   13   14   15   15   15   15   15   15   15	SCSSEK	29957233	SPANST English Indieno Shiend Wash Pamais at Cookumn I	LANK X - ELENGATURE	 ::	••••	1. Mage. 17	CAFP. 5-10'S (2-Sh	\$30 -12 S	1 00-Aug 16	
## SCHORENOSTOCK   MEE Transport Weath at Contract 18th   Meeting at Meeting at Contract 18th   Meeting at Meeting at Contract 18th   Meeting at Contract 18	MESON	20557236	West IN Est Shoot Was Panes at Column Live M.	N - EL 2038-2155	(3) [**	٠	N. Cop. 17	CAP 6-192 CES		3. St. P. 100	,
2003Berseloin- Selling From Control Line W. M El eigen in 2009 in 2009 in 11 May 17 103-May 17 1	SCT3R	SNSSYSEE	NEE Testing for Wests of Calenta Line 18 - 18 - EL 20	DSG-2188	?		F-8629: 37	EAP. 5-1056 (2.5)	13: SS	S COMPAND 15	
### SCHOOL STANDS TABLES OF STANDS TABLES OF STANDS TABLES OF STANDS AND STANDS OF STANDS AND STANDS OF STANDS AND STANDS OF STANDS OF STANDS AND STANDS OF		20000000	SSHIELS FRESK CONTINUES AT SONICH PRESERVE ON CORM	ective N. M El 200 to 219	es es		27 400	DAP-5-103 (2.5);	M	38-43.05 16	;
\$4-£019-14		9198Y277	KPAGE BOLD INVEST SHEET WAS PAINS A COLUMN L	Ne N.R. EL 2108 to 2298	8	3. Kiny. 17 . 02	F-825-17	EAP. 5-155 (2.5)	2 : XX	3 CR COMP- 16	85 OS:
				VCS UE Appainted Wink Shift Activities to Support Sept 2518 Sub	belanded	24-AUX	*				
				Campation						~	Complete Com



Proprietary and Conficential

# Acceleration Review - Work Shifts

25.7259-2579778   Wildle State Not Workshop State Not William S	42. 30.	Actual: 13	Ashirity Name		e e	ts 88	<b>.</b> इंग्रह्म	Calendar	Model Floor	Construction of the constr	Light Finish	
CONTRECTORS SELECTORS SELECTION CONTRIBUTION N. N. E. E. E. CONTRECTORS SELECTION CONTRIBUTION N. N. E. E. CONTRIBUTION N. N. E. CONTRIBUTION N. N. E. CONTRIBUTION N. N. E. E. CONTRIBUTION N. N. E. E. CONTRIBUTION N. N. E. CONTRIBUTION N. N. E. CONTRIBUTION N. N. E. CONTRIBUTION N. N. E. E. E. CONTRIBUTION N. N. E. E. E. CONTRIBUTION N. N. E. E. E. E. CONTRIBUTION N. N. E.	27	205522:155 Y380		E. 218 602 2286	8	15-May-17	12-305-17	1 :	372	35 Apr 36	36-505-00	7~~
### COCKNINGS FOR THE PROCESSES AND	127	2CT582198Y272	NGE Testing for Welds at Octom Line N - R - EL 23	\$6-22006	irono.	17-May-17	1. Jun 17	EAP - 5-10'S (2 5100)	₹	13-Sap 16	31-Oat 16	~~~
Content   Cont	33 *********	30C9B2190C148	Sat-Lip & Place Contrate at Sheid Panels at Column	the Mar Elements	eu 	14. Jun 17	16-, AUS. 17		172	13-Cot-15	13 Oct 18	
CONTRIGUENCING   1985	6	2033822387248	SPAS Install Intel Shart Wall Pares of Column Li	INS N - N - EL 2296 to 2306		22-3173-17	28 30: 17	247 - 5-10'S (2-5)NO.	23	23-DG-15	\$7-KON-76	
CONTRINCTION   Set 12   Place Course of Stand Period & Country 1 has 14 h. E. 200 m 200	SH SH	2058822987251	West offices Sheet Was Parets of Column Line N - N	1. El ens do ense		25 All 17	いぞれ	DAP 5 MB 2 SAME	Ĕ,	21.00.15	22-8608-65	
CONTRINCTORY SINCE & Proceedings of State of the Control and N. H. Electric colores of State	33	22TVS223SV286		86.253E	••••	F1 400 00	各地打		(2) ***	31 PO SE	35 Nov 16	
### CONTRINGENTIAL PART OF THE ACT OF THE AC	ä	2CCSS229CC977	Set Lip & Piner Congress at Shield Perseis at Cirkums	1 ins # W - El 225 w 235	•	25.000 52	38. Ac. 82	n Zi	E.	25 *tO* 35	29-Kov 16	
CONTRIGUESTORN   Mail: Tender by Wakes of Charles and Charmes an	æ	20SSB23087254	MANN HOUSE WITH MINN WAS PRICE AL COLUMN L	ine N - 4 - EL 2393 50 2486 1/2	·	24 Aug 57	38.4 or 17	i	Š.	58. Dec 16	53 Jan 17	:
CONTRINGENCY   CONT	33	2086283834320	Weld INSENSING Was Panes at Country Line N. N.	). El 2395 to 2485 tiz	•••	St. 250 17	5: Sep- 17	E40. 5.108 2 SMM	33	08-13g 16	CS (201 CT	
COMMISSION   Selector Report at Season Less of Character	·	2CTSR239SY258		88 to 248 ti 2"	93	10.Aug. 17	S 85 77	SAP 5 ME 2 SANS	ş.	12-Dec 16	57-4M3-75	····
COMMITTED   COMM	32	300008888008		1. tre 14 N - E. 232 to 2485 1/2	·	23 458 43	57 - Sept. 77	DAP. S. RIS C. SAME	57	29-329-17	71-1805-17	·
CAMENDONING   Dec Structure Stand Colorents & Colorent & Colorents & Colorent &	3		2									2000
COCAMINICORNO   Internal Floate - Frances From Strate Monthly (1997)   Control Fro	8	ACOAMA MASSAGA		ing at Amer (Ric Ares 2 C). 4 1-9 & 5-8 E, 1500-139	§~~	15.XXX-15	St. 405-15	1040 - 5-10's (2-5) King	S (2)	æ	07-1004-40	***
Colonision Character   Colonis   Proceeding   Colonis	, Y	SOCANI CONTRANT	HOWERS HOLD STATE FROM SHIPS WITH HIS WING	H. GANDAMAN SHOOM 14 KI CO S AL ANNON HIM. AND 3. F. (103), 17		27.23.55	15. bm. 15	1249 S. 1278 (7.248)	8		St. San. 15	
CAMINTOCHES    Inside Barrow Pier Rainf Steps in Decking of Febra Avinov Bitg Avez C.C.4.1 of 1.6 H 1975   10   10 - 144 in 19   10 - 144 in	· 3	OUT PRODUCTION	ingst Boter-Embers From at 38 8503-8504-38 13	Ander 200 E Between SLA 1-8 E 158: 178	9	13.489.15	25. Mg. 15.	E4P. 5.138.25888	23	Sec. 35	ST-800 15	
Color   Colo	8	SONAMENTANAMES	man Booker Fire New Separate San & Ca	CANNOTE FROM AND SERVE A CO. 4 + 9 & 5 H B 1 (75	2	23 (M7 53	16. At 15	DAT S (TS (2 MAN)	8	17 500 15	8	·
Proceedings   Process	00000 اڅ	SUCERMAN SUCE	insisi Bator. Enforts. Form Bandrainnan Fans S	Sobdenga Hite dens 2 C + 1 at C 4 E 1 C C	2	10.00 to	54. by 55	5347 S. S. 873 (3 ST 883)	g.	27.15	55.005.15	
COMMITCHES  PRODUCTORING PRODUCTOR PRODUCTOR   PRODU	t 13	000 CARRO (TEC. 000)	house For Embade & Oremphys of Floor Sich Agrees	Address a 2 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0		25.25.20	N. 2. 2. 75	5.40 5.400 W. S. 4000	í	03.700.30	3,32,33	
Coloniary Coloniary   Constitution	3 8	SUPCONSTRUCTOR	Boss Covering from at Floor Sixth Worse Floor Acces	90.4+% 0.90 to 15%	***	20 May 20	S. 4. 9.	24. 5. 87. (3. 7. 8. 8. 8. 8. 8. 8. 8. 8. 8. 8. 8. 8. 8.	8	5.5	χ. Α	
Excelosion   Teach Places February February Profession   Teach Places Places Places February Profession   Teach Places	·	SDC488470F409	Cire Contrate of First Sub-Arman 2011 Ama 7 Cir.			33 -50%-38	30-AUG-15	DAP. S. ETS C. Spirits	83	\$5.024.15	20-02-15	
CCANNITCRATA   Prize Clark Record Entract Form in Walf Wind Size (W to CL Editament CL 41.71 Annue Big Araz EL 1240 1879)   1 144.05 to 1 15.05 pt 18 CMP 5 1919 2 Biblio ES 25 Abras 2 CCANNITCRATA   Prize Clark and Walf Wind Size (W to CL Editament CL 47.7 Kente Big Araz ER 1240 1875)   1 14.05 pt 18 CMP 5 1919 2 Biblio ES 25 Abras 2 CCANNITCRATA   Prize Clark and Walf Wind Size (W to CL Editament CL 47.7 Kente Big Araz ER 1175 1873)   1 14.05 pt 18 CMP 5 1919 2 Biblio ES 25 Abras 2 CCANNITCRATA   Prize Clark and Walf Wind Size (W to Clark and Walf Wind Size (W to CL 47.7 KENTER)   1 14.05 pt 18 CMP 5 1919 2 Biblio ES 25 Abras 2 CCANNITCRATA   Prize Clark and Walf Walf Araz ER 1874 1874   1 14.05 pt 18 CMP 5 1919 2 Biblio ES 25 Abras 2 CCANNITCRATA   Prize Clark and Walf Walf Araz ER 1874 1874   1 14.05 pt 18 CMP 5 1919 2 Biblio ES 25 Abras 2 CCANNITCRATA   Prize Clark and Walf Walf Araz ER 1874 1874   1 14.05 pt 18 CMP 5 1919 2 Biblio ES 25 Abras 2 CCANNITCRATA   Prize Clark and Walf Walf Araz ER 1874 1874   1 14.05 pt 18 CMP 5 1919 2 Biblio ES 25 Abras 2 CCANNITCRATA   Prize Clark and Walf Walf Araz ER 1874   1 14.05 pt 18 CMP 5 1919 2 Biblio ES 25 Abras 2 CCANNITCRATA   Prize Clark and Walf Walf Araz ER 1874   1 14.05 pt 18 CMP 5 1919 2 Biblio ES 25 Abras 2 CCANNITCRATA   Prize Clark and Walf Walf Araz ER 1874   1 14.05 pt 18 CMP 5 1919 2 Biblio ES 25 Abras 2 CCANNITCRATA   Prize Clark and Walf Walf Araz ER 1874   1 14.05 pt 18 CMP 5 1919 2 Biblio ES 25 Abras 2 CCANNITCRATA   Prize Clark and Walf Walf Araz ER 1874   1 14.05 pt 18 CMP 5 1919 2 Biblio ES 25 Abras 2 CCANNITCRATA   Prize Clark and Erope 2 CCANNITCRATA   Prize C	73	SCC4NS17CH453	Install Basis: Endacts Exem at Was Wilds 8 96 15 C.	8-7-1 Amer Skit Ama 2 El. 1248 1853	ţ	15. Ago 15	24 8.0-15	EAP. 5 108 2 5 833	30	23-Oct.15	C3-NOV-15	7.7
Coloniary   Plane Concrete at Walf Wilderwal Eagle Le Bassand 2.4.77   Annual Eagle Anaz E. H. 175 (1982)   16 500   15   16 500	8	SOCANTIOCS ASSESSED	Install Bahar, Errinach, Erson at Wick Will sand Will S.	(1 E. Bouroso C): 4 1.7 1 Arras Bits Area 5 E. 124 5.1353	2	17. AUC. 15	37.40.0 35	245 5 10's 2 5 18's	b	05-MOK 15	19 KON-15	<b>7</b>
Exceptivity   Entropy	8	まりてきなけまるしてとなり	Para Courage at Wakie 13 Amery 2017 C Fromes	888 C. 4 & 7 5 E. 1876 1863	•	34 382 15	SS-505 15	CAR- 5-125 (2-5) (25)	8	35-May 15	24 KON 15	
2.04.649   Table   DAP   Entire Control   D	5	20CANTIACESTO		1 Ameri 800 Area 2 EL 1175-1383	Ť		16 Szo 15	547 5 10's 2 Shitter	123	24-305-15	SD KOK 10	
20 CAMINITESH   Fig. Self-coline Committee Case Self-coline Case Self-co	8	SCH AND STANKEDS		(Equipment at Arms Ship Arms 2 Am 49414 5) 1175 (50)	m		18 830 15	245 5 138 2 2 KN	S	SO 1808 15	32 Dec 15	
COMMITTEH   Insert Standard & S	8	20EAN 17EC++	BEA Sel Led Const 513-EX 21/22/22-444ma	K Bido Avos 2 8m 40414 El 1976	:	21 Sep 15	25 SSP 13	EAP 5 125 2 SWE	ñ	08 Day 15	Ce Dec 15	
2.04KN177M1944   Local Phot design PAMC VMS Dard and Supports 81 Phot state 1970 and Anna 2 E1174 and E H E11273   19 14 Caris   20 Caris   2	đ	20CANTITION A	Install Scattowing & Sharing Peatures at Arman Bing A	Ares 2 Am 46414 B 117%	:	25 Sep 15	2 6	247. S. 138 2 SKIN	ş	08-Dep 15	32-Dec-35	
Procession	8	SONEWSTANDANG	Load Pro-essys HVAC VVS Deet and Supports at Ro	om 8% 46414 Ass 2 B 1178		388	2 2 2 3 3	DAP 5 133 2 Mais	æ	77-Dec-15	SP 2062 43	
2004N1907CF997   Cure Crosses at Free Sect Annua Boy, Area 3 FM FAVEST-ANNUAR BOX 17.4   seri dE HB 1353 and Atoma   2004N1805CF392   Each Shrudarai Escal Cultural Box Area Box Area 3 FM FA-22 E112573   E H 45pc: 18 E3-Apr: 18 E3-Apr: 18 E3-Apr: 18 E3-Apr: 19 E3	8	20SAM135SS402	hami Filer Shear Suppramental Steel and Dodwy for	r Foor at Area 2014 + 14 and EHE 1363		•	28 Q: 53	į	8	28 282 38	13.4mm 16	:
2024M1935San1   Enert Structural Exact Colorans and France Alexa St. 2. 4 1 and E.4 El 1959 and Alexa St. 2. 4 1 and E.4 El 1959 and Alexa St. 2. 4 1 and E.4 El 1959 and E.	101	2CC4NNG/CF357	Cure Concrete at Fina Sab Arman Billy Area 3 RM F	RM 4005740058 E 1000 1072	,		23.8888.52		Š	SS-Dep-15	34 Dec 15	
25 CANTSOCT-427   Cure Councide Arms Brog Area 2 RM 45-47 El 125734   18 April 16 States 18 April 18			Bed Studius! Start Columns and Framing Aras 3 C	3.2.4.1 and E.H. E. 1353 and Anne			SS-402-15		2	22-May-16	Vi-Ray-VE	
### ### ### ##########################			Cura Concrato Armen Berg Aros 3 Aill 42442 El 125			31-30-11	18-ACK-18	CAP - 1-100 (14 800)	<u>ش</u>	33-34-08	OF-888:-:E	
### SCHANISCHER  ### SC	T		Install Filth Beams Steams Supplemental Meet and	[Decking for Figur SistrA.vs.3.0], 2:4, (wird 5:4 🖻 135'3	****	35.Apr. 16	25-56ky-3E	SAP. S. 173 C BANK	ည	15-56cp- 76-	23-8889-16	
## 1554N1995GAR3 Install Exertion Control of Fig. 24			innial Retar and Embads at Floor Sub Amer Bidg. A	1888 3 St 2-41 51853		30-36ay-15	36-56ay- 25	CAP. S. 1935 (2 SME)	2	25-May 16	35.4XX.25	
### ### ##############################				Amer Big Are SCL 24. ( I 1353		32-May-16	16-khye 38	247-5-10's (2 Bhills)	ă	25-May-16	02-XX9-56	
20CANNISSCIPACE   Cure Concrete at Facer Sub Arman Biog Area 3 CL. 2-4 1 E 1957-5   15-30 to 14-75   5   17-405-16   17-405-16   18-30-16   1	1		Place Congress Floor Sook at Floor Statchmere Bibly &	wes: 201.0-41 € 1153	~	16-38ay-15	37-8My- 25	CAP. T. 125 (2 SPACE)	 %	55-3km 16	53. Em 16	,,,,,,
2.CCANTESCENSE         Install Rebail - Forms and Embasics of Walf Widt Widt 2007 10 24-11 Annex Big Ct. 4 Et 1353 to 147'S         Et. 1353 to 147'S         Et. 1353 to 147'S         1 (02 Jan. 15 (03 Jan. 15 (	Г		Cure Congress at Foor State Armen 2003 Anna 3 Ch. 2-	4.1 E 1983	ĸ	17-10ay-15	53.4000°52	CAP 7. NOS (150 SNE)	38	33-38R-1E	SE-338-36	
# 20CANTISSOCISSE   Place Conserve at Was Wyozyvi D 2.4 Anne	T-		Indail Rebar - Forms and Embads at Walt WIZW 19.	24.1 Annax Bidy Ana 3 EL 1983 in 147 B	6)	23-May-15	SE-300: 15	EMP - 5-13's (2 51m)	F	08-483-1E	\$3-83-E	٠
24 में एयू पं	$\overline{}$		Asso Consists at Walf World With 2-4 Amm Bldg CL	. # El 1353 to 1473	~	33 W. S.	83.4m.15	5.47 - 5.13 (2.548) se	;=	12.Jan.16	18.43.16	
				VCS Uz Accelerasol Wark Smit Advices to Support Sept 2016 St	Comis		4. p.			6	yearly o's and	, derrige
				was and transp						á	A THE CHARLES	



Proprietary and Conficential

## Acceleration Review - Work Shifts

13   SCENARTOCHO   200   March   200   Mar	જા	Activity III	Activity slams	â	Start	Fanst	Castendar	Mai Te	Late Stars	Late Fried
### CENTANTICATORS   Part Character   Pa	183	2CC48847CR503	Spiris Robert Forms and Emborin or Wall William 10 Et al Amber Adjores of 1470-1086	80	13 AUG. 60	<b></b>	DAP - 5-123 (2 Shifts)	J	24 Jun-15	07-36-15
COMMISSION   Property of Section 2 (1992)   COMMISSION	2		main Electron Entracts and Commong at Wall Will 24 Annew Bidgi Anna 3 EL 1470-1690	••••	14.30.01		CAP. 5-10% (3-Shifts)		25-AUS-16	27.486.73
Contribution   Cont	20	44444	Haca Concrate of WaitWatM to Extherine Bith has a Cl. 4 € 1470+505				EAST 5 10% (2.5h)(a)	£	ST-34.5	ST 505 116
2.544111.45 (v) main few Percent in Equation and a few filters are a few filters of the few control registered in America 1 and a few filters of the few filters and a few fi	\$23	:	Parking and Caating Application at Forms 40500 Area 3 E 1253		27-Jun 18		CAP. S-123 (C Shifts)	<b>(</b>	87-70-18	13.38-18
Accession of the processing Explanation	323		hand fee Protestan Equament at Americans Blag Area i and 2 Elisons. 1176	\$	23-23.43	····	EAP- 5-12'S (2'Shifts)	i	25-45.03 36	27-00:36
Colonia State   Page 2016   Colonia State   Colonia	2033 2033		Insas Fre Proposo Equipment advas 1-2 and 3 st 1175-1259	*	37-52.75	····	EAS- 5-10% (2.5) (NE)	i	S. 40,0 15	33-004-15
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200-249   200-	324	SCHAMISSAHSES	Rig and Sat HFL as & His Mischine Shap AHJ (YHS MIS 31 AR) at Annar Bay Area 3 RM 40509 EL 1853	(H	25-km t6	<u> </u>	EAR- 5-10% (2-Shifts)	Ì	12-20:16	14.000-75
Accordance   Company   C	\$25	2CHANGSWASES	Hig and Sed Non-Radonative Vansiator AHV (VXS-NXS-07A/B) at Annea Rog Area 3 RM 40309 EL 1853	~	31 457 70		EAP. 5-10% (2.5) (812)	i	32 444 18	
Continue State   Con	\$25	20C4832547503	hada Somiciding Storing Philarise Temporay Lighing at Armas Sidy Ama 2 Rik 40503 E. 125's	ro	27-Jun 18	····	DAP. 5-10'S (2 Shifts)	<u>.</u>	31 407-61	\$5-38-15
2.52491   CG-249   Control State Prints & Armen ED, Arma CB, 1   CG-240	SZ.	205EANY 305EROES	Load Pre-stage Cable Traya Conduist Supports at Arman Stop Area a Fits 40x0s EL 1853	es 	30,230,18		L.,	ĺ	25.44.85	27-38-75
### Control of the Co	23	2CSANI SESSOI	insail Film Sizoli Supplemental Sleet and Dadwig for Floor Sizo Area 3 Ci 2 4.1 and 5 H 51 1580.	(£3	ST-38:36	14.305.15		<u>.</u>	35 Jan 18	36 38 16
### STANDARD CONTRIBUTION OF THE CONTRIBUTION	ά	20Saktry0Seast	Establish thismai Control Survey Politis at Armer Bitg, Aran 2 El 1855 and Above	~	14.30.15	35-46-55		i	24.45.55.36	25-A.03-76
According 1997   According Accordi	333	1000PNSSNAPHOS	Bulk insistlation of HWC Duct Supports at Acress (Styp Area 1 RM 405/24 EL 1957) and Abose	œ	15,2415	27.At 15	i	8		30 Sta 76
### ### ### ### ### ### ### ### ### ##	\$3	2CEAN: SSEREN:	instailainn of Lighting Conduiss-Supports-Cathès at Annas Bidg Asea & RM 40503 EE 1952	(cι	15 July 16	••••	DAP - 5-10'S (2) STATES	8	35 Aug 16	26-Sap-15
### STATEST   ST	382	20EANI30EHEE	incatation of Cable Tray and Condul Supports of Arnex Blag Ares 3 RM 4:003 E1: 185'9	œ	15,25,15	····	DAP 5-10% (2-Shifts)	a	25 Asay 16	OS. SEO. 36
2.C.A.N. 1966 For the State and House Big Area 1 RM 4000 EL 1927 and Area 2 RM 4000 EL 1927 and Area 4 RM 4000 EL 1927 and Area 2 RM 4000 EL 1927 and Area 4 RM 4000 EL 1927 and Area 2 RM 4000 ER 1927 and Area 2 RM 4000 EL 1927 and Area 2 RM 4000 EL 1927 and Area 4 RM 4000 EL 1927 and Area 2 RM 4000 ER 1927 and Area 2	:33	20EAM30EF571	Individuon of Cable Tray, Canadil Mankaga at Amer Bilg Aces 3 FM 40502 Et. 1203.	œ	35 15 ES	St. 48. 55	EAR- 5 to's (2 Shills)	8	25. Aug. 15.	27 Sept 16
### 2007.00   Challe Pol submer Bibly Area of Pol 40000 E. 1923   ### 2007.00   Challe Pol submer Bibly Area of Pol 40000 E. 1923   ### 2007.00   Challe Pol submer Bibly Area of Pol 40000 E. 1923   ### 2007.00   Challe Pol submer Bibly Area of Pol 40000 E. 1923   ### 2007.00   Challe Bibly Area of Pol 40000 E. 1923   ### 2007.00   Challe Bibly Area of Pol 40000 E. 1923   ### 2007.00   Challe Bibly Area of Pol 40000 E. 1923   ### 2007.00   Challe Bibly Area of Pol 40000 E. 1923   ### 2007.00   Challe Bibly Area of Pol 40000 E. 1923   ### 2007.00   Challe Bibly Area of Pol 40000 E. 1923   ### 2007.00   Challe Bibly Area of Pol 40000 E. 1923   ### 2007.00   Challe Bibly Area of Pol 40000 E. 1923   ### 2007.00   ### 2007.00   Challe Bibly Area of Pol 40000 E. 1923   ### 2007.00	\$	2CHANNESMEEN	Bulk hyddaeon of HWG. Duz ard frausion at Amer Bog Area ; PM 40509 E. 1879 and Abore	2	23.40 1E		DAF-5-10% (2.5%)	g	ST 480 TE	21-30p-15
### 25-541 to 14 Aug. 16	385	2054433538130	Cabis P.3 at Ansar Bitg Ass a RM 40505 EL 1303	ğ	28,50,15		EAP - 5-19" (2-Shitts)	:	ST-Sep-16	21-Sep-36
### Characteristics   Remove Statistics   Reference Caracteristics   Refere	383	ZCENNOSEGSS	here Erativs County at Asses Big Area S FIX 40503 EL 1853	2	25 AN 16		CAP. 5 tes (2 Shills)		87-Sep. 16	27-830-16
### CPAN 1262-CAN   NEWS ECS MAC CANNOT CANNOT CANNOT CANNOT EL 1957 IL 1957 I	133	2CC49Nassavters	Hamova Scalvsking Shoring Pathorne. Tangovary Lighting at Amera Bidg Ana 1 RM 405601 EL 13573-1549	60	11-400-16	:	DAP-5-100(2 NINE)		21-Sap 16	24 3ep 16
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### CC-NAN 126-LOSS   Right of Start   R	89	ZCF4N136F9503	Compass heateden of FPS Large and Sheat Bore Postg and Valvas at Arnor Biog, Area a RW 40503 EL 1859-1560 (SC	ia S	22 Aug 15		E4F. 5105 (2.3h8))	2		# #
### 1825   AND STATES   PARTIES   PA	1		Hig and Saf Pic Finnes P. S. JO. RIO 454 and 454 and man 2835 Aras 3 RM 40503 EL 1000	i	83-400 SS	:	DAP - 5-1838 (2 MAN)	81	,	SE Cut 16
14. Con 19.	1		PLS Calenci PLS. JO PKICHEN. News Borg Fin 40508. Flows for Companient Teating 15, 1853 Aleas 2	a		٠	EAP. 5 10'5 (2 Shits)	: "		3 BO 8
W.C.S. Liv Accelerated Work Briff Activities to Support Sapt 2018 Butstands 14	1	ACED REGISTROPING	mark Can Declaration Consistence of America Edit America College (1985)	U	37 Sec. 10		CASO A town Space	8	: .	32 000
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		THE REAL PROPERTY AND ADDRESS OF THE PERSON						William.		

Proprietary and Confloential

# Acceleration Review - Shield Panels

Section 1999   Section 1997   Sect	College	SECURIOR 1998/2015   Delivery Via Sammer Unit 2 Lane 1895 VSC 104   14,000   14,000   15,00	SECNODE 178%52-100 SECNODE 178%52-164 SECNODE 198%52-184 SECNODE 198%52-184 SECNODE 198%52-134 SECNODE 198%52-134 SECNODE 198%52-134 SECNODE 198%52-136 SECNODE 298%52-136 SECNODE 298%52-134	Newy - VC Barranse Unit 2 Level 1996 9' VSS-104  Newy - VC Barranse Unit 2 Level 1996 9' VSS-11H  Newy - VC Barranse Unit 2 Level 1996 9' VSS-12H  Newy - VC Barranse Unit 2 Level 1996 9' VSS-12H  Newy - VC Barranse Unit 2 Level 1996 9' VSS-12H  Newy - VC Barranse Unit 2 Level 1996 9' VSS-12H  Newy - VC Barranse Unit 2 Level 1996 9' VSS-12H  Newy - VC Barranse Unit 2 Level 1996 9' VSS-12H  Newy - VC Barranse Unit 2 Level 1996 9' VSS-12H  Newy - VC Barranse Unit 2 Level 1996 9' VSS-12H  Newy - VC Barranse Unit 2 Level 1996 9' VSS-12H  Newy - VC Barranse Unit 2 Level 1996 9' VSS-14H		1	51-888-45 42 404 64	4	GE-1887-15	31-154-33
Fig.   Delandon, UK, Sammer Unit 2 Land 1925   Vac2 1144   Colon 192   Colon	Fig.   Colorino   VC Samme Unit 2 and 12 a	Fig.   Colorino   V.C. Samme   Unit   Ease   Colorino	T & M & B X 2 % & K K & X & X & Q & A & A & A & A	I I I I I I I I I I I I I I I I I I I		····	+2 40 K C+			
Delivery - CC Surmen UNIZ Zenes 1905 V V V SZ 126   14	SECUCIOE 1999/2012   Colorary Vio Sammer Unit 2 abed 1965 VS-2114   Colorary Vio Sammer Unit 2 abed 1965 VS-2124   Co	SECURIOR 1992/2012   Delivery VI Schmen Unit 2 and 1965 VS2-124   4   15-40   16   16   16   16   16   16   16   1	SERVICIELISMOSA: 151 SERVICIELISMOSA: 152 SERVICIELISMOSA: 122 SERVICIELISMOSA: 123 SERVICIELISMOSA: 124 SERVICIEL	New york   No. Statement China   2 Level 1956   V. V. S				۲,	S. 40x-35	
2.3.         Designation Constraints (bit 2 lease) 1925 7 Vo2. 128.         4         1. Lans 167         15. Lans 167	SERVICHE (1992) 12. Delies y 17. Statement 1012 Level 105 5 Visit 104.  SERVICHE (1992) 12. Delies y 17. Charment 1012 Level 105 5 Visit 104.  SERVICHE (1992) 12. Delies y 17. Charment 1012 Level 105 5 Visit 104.  SERVICHE (1992) 12. Delies y 17. Charment 1012 Level 105 5 Visit 104.  SERVICHE (1992) 12. Delies y 17. Statement 1012 Level 105 5 Visit 104.  SERVICHE (1992) 12. Delies y 17. Statement 1012 Level 105 5 Visit 104.  SERVICHE (1992) 12. Delies y 17. Statement 1012 Level 105 5 Visit 104.  SERVICHE (1992) 12. Delies y 17. Statement 1012 Level 105 5 Visit 104.  SERVICHE (1992) 12. Delies y 17. Statement 1012 Level 105 5 Visit 104.  SERVICHE (1992) 12. Delies y 17. Statement 1012 Level 105 5 Visit 104.  SERVICHE (1992) 12. Delies y 17. Statement 1012 Level 105 5 Visit 104.  SERVICHE (1992) 12. Delies y 17. Statement 1012 Level 105 5 Visit 104.  SERVICHE (1992) 12. Delies y 17. Statement 1012 Level 105 5 Visit 104.  SERVICHE (1992) 12. Delies y 17. Statement 1012 Level 105 5 Visit 104.  SERVICHE (1992) 13. Delies y 17. Statement 1012 Level 105 5 Visit 104.  SERVICHE (1992) 13. Delies y 17. Statement 1012 Level 105 5 Visit 104.  SERVICHE (1992) 13. Delies y 17. Statement 1012 Level 105 5 Visit 104.  SERVICHE (1992) 13. Delies y 17. Statement 1012 Level 105 5 Visit 104.  SERVICHE (1992) 13. Delies y 17. Statement 1012 Level 105 5 Visit 104.  SERVICHE (1992) 13. Delies y 17. Statement 1012 Level 105 5 Visit 104.  SERVICHE (1992) 13. Delies y 17. Statement 1012 Level 105 5 Visit 104.  SERVICHE (1992) 13. Delies y 17. Statement 1012 Level 105 5 Visit 104.  SERVICHE (1992) 13. Delies y 17. Statement 1012 Level 105 5 Visit 104.  SERVICHE (1992) 14. Delies y 17. Statement 1012 Level 105 5 Visit 104.  SERVICHE (1992) 14. Delies y 17. Statement 1012 Level 105 5 Visit 104.  SERVICHE (1992) 14. Delies y 17. Statement 1012 Level 105 5 Visit 104.  SERVICHE (1992) 14. Delies y 17. Statement 1012 Level 105 5 Visit 104.  SERVICHE (1992) 14. Delies y 17. Statement 1012 Level 105 5 Visit 104.  SERVICHE (1992) 14. Delies y 17.	SERVICIDE 1999/25   12   Delivary - 10 Statemen Unit 2 Leas of \$5 Vis. 154   1   1   1   1   1   1   1   1   1	SEZVODE 198%C2-128 SEZVODE 198%C2-128 SEZVODE 198%C2-128 SEZVODE 198%C2-124 SEZVODE 198%C2-124 SEZVODE 198%C2-124 SEZVODE 198%C2-124 SEZVODE 198%C2-126 SEZVODE 198%C2-126 SEZVODE 198%C2-126 SEZVODE 198%C2-126 SEZVODE 198%C2-126 SEZVODE 198%C2-126 SEZVODE 298%C2-136 SEZVODE 298%C2-136 SEZVODE 298%C2-136 SEZVODE 298%C2-136 SEZVODE 298%C2-134 SEZVODE 298%C2-134 SEZVODE 298%C2-134 SEZVODE 298%C2-134 SEZVODE 298%C2-134 SEZVODE 298%C2-134	Newy - VC Summe Unit 2 layed 1925 5 VS2 128 Newy - VC Summer Unit 2 layed 1925 7 VS2 128 Newy - VC Summer Unit 2 layed 1925 7 VS2 128 Newy - VC Summer Unit 2 layed 1925 7 VS2 128 Newy - VC Summer Unit 2 layed 1925 7 VS2 128 Newy - VC Summer Unit 2 layed 1925 7 VS2 128 Newy - VC Summer Unit 2 layed 1925 7 VS2 128 Newy - VC Summer Unit 2 layed 1925 7 VS2 128 Newy - VC Summer Unit 2 layed 1925 7 VS2 128 Newy - VC Summer Unit 2 layed 1925 7 VS2 128 Newy - VC Summer Unit 2 layed 1925 7 VS2 193 Newy - VC Summer Unit 2 layed 1925 7 VS2 193 Newy - VC Summer Unit 2 layed 1925 7 VS2 193 Newy - VC Summer Unit 2 layed 1925 7 VS2 193 Newy - VC Summer Unit 2 layed 1925 7 VS2 193 Newy - VC Summer Unit 2 layed 1925 7 VS2 193 Newy - VC Summer Unit 2 layed 1925 7 VS2 193 Newy - VC Summer Unit 2 layed 1925 7 VS2 193 Newy - VC Summer Unit 2 layed 1925 7 VS2 193 Newy - VC Summer Unit 2 layed 1925 7 VS2 193 Newy - VC Summer Unit 2 layed 1925 7 VS2 193		•	20.00		S	3
ER         Delivery - US Sammer Unit 2 Lane 1985 F Voz. 12.         4 H. Luhn 16         5 Luhn 16	EX.         Definition of Columns (1985 CMS 12.EE)         4         11-Auth 16         55-Auth 16	E.E.         Deficient Construction (No. 2 Lanes) (1965 V VS2 12.E.         4         11-Austr 16         5-Austr 16         4-Austr 16         4-Aus	# # # # # # # # # # # # # # # # # # #	I levy - VC Surrored Unit 2 Lavel 1067-5 VSZ 12E  I levy - VC Surrored Unit 2 Lavel 1067-5 VSZ 12E  I levy - VC Surrored Unit 2 Lavel 1067-5 VSZ 12E  I levy - VC Surrored Unit 2 Lavel 1067-5 VSZ 12E  I levy - VC Surrored Unit 2 Lavel 1067-5 VSZ 12E  I levy - VC Surrored Unit 2 Lavel 1067-5 VSZ 12E  I levy - VC Surrored Unit 2 Lavel 1067-5 VSZ 12E  I levy - VC Surrored Unit 2 Lavel 1067-5 VSZ 12E  I levy - VC Surrored Unit 2 Lavel 1067-5 VSZ 12E  I levy - VC Surrored Unit 2 Lavel 1067-5 VSZ 14C  I levy - VC Surrored Unit 2 Lavel 1067-5 VSZ 14C  I levy - VC Surrored Unit 2 Lavel 1067-5 VSZ 14C  I levy - VC Surrored Unit 2 Lavel 1067-5 VSZ 14C  I levy - VC Surrored Unit 2 Lavel 1067-5 VSZ 14C  I levy - VC Surrored Unit 2 Lavel 1067-5 VSZ 14C  I levy - VC Surrored Unit 2 Lavel 1067-5 VSZ 14C  I levy - VC Surrored Unit 2 Lavel 1067-5 VSZ 14C  I levy - VC Surrored Unit 2 Lavel 1067-5 VSZ 14C		•••	CL-CHI-TO	2	a - 10003-15	14-30gh-10
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Control   Cont	Contract	Contract	<u> </u>	heay - VC Saranee their 2 Level 1997 87 VEZ-12K freay - VC Saranee Unit 2 Level 1995 87 VEZ-12G freay - VC Saranee Unit 2 Level 206-57 VEZ-13G freay - VC Saranee Unit 2 Level 206-57 VEZ-13G freay - VC Saranee Unit 2 Level 199-67 VEZ-12D freay - VC Saranee Unit 2 Level 206-67 VEZ-13A freay - VC Saranee Unit 2 Level 206-67 VEZ-13A		4 39-105-16		ş	31-Way-15	54-54EV-15
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Delivery - O. Surrame Unit 2 Level 2005 - Visco 150.   A 18-Aug-16	Delivery - U. Sarrame Unit 2 Lavel 2005 5 V22-152   School 10	Delivery - U. Sammer Unit 2 Level 1967-5 Vi20-195   A 16-Aug-167   E-Aug-167	88895d#79			\$ 38-A1K3-15	· · · ·	*	35-Aut 16	21~(881-15
Delivery - VC Summer Unit Zereel (20% or VSZ-145)         4         Th-Aug-16         FrAug-16         47         Th-Aug-16         77         77         78<	Delivery - CC Statemen Unit Z Level 1962 - 5 Vo2-12D	Delivery - CC Strates Unit Z Level 1962-5 V22-12D	3 8 8 8 8 <b>5</b> 7 9	IRRY   - 3C-303/RED ON 1.2 Feet   150 - 57 VSZ-12D   IRRY   - VC SANTON UNI 2.1 see   150 - 57 VSZ-12D   IRRY   VC SANTON UNI 2.1 see   250 - 57 VSZ-13D   IRRY - VC SANTON UNI 2.1 see   250 - 57 VSZ-13A   IRRY - VC SANTON UNI 2.1 see   250 - 57 VSZ-13.		#D-4180~18	Ť	127	15. 2. P. 16	21. Just 13
Delivery - VC Summer Unit 2 Level 280° 5 'V22-134.   A Delivery	Delivery V. C. Summer Unit 2 Level 2009 of Vizz 124.   Delivery	Delivery V. C. Summer Unit 2 Level 2005 e VS2-134.   4   75 Aug-16   75 Aug-	388927	IN MY - V.C. CANDRIS UNIT LIEVE 1943 - V.C. 122.  IN MAY - V.C. SANDRE UNIT LIEVE 1284 ST V.C. 122.  IN MAY - V.C. SANDRE UNIT 2184 ST V.C. 132.  IN MAY - V.C. SANDRE UNIT 2184 ST V.C. 133.		31.03.23. 8		F	11-855ay-15	34-133-15
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Delivery - VC Summer Unit 2 Level 2016 7 VS2-134	3.4.         Desilveny - V.C. Summer Unit 2 Level 2016 7 VS2-134         4         2 A A Angle is Unit 2 Level 2016 7 VS2-134         4         2 A A A A A A A A A A A A A A A A A A A	A Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-13.  1. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-13.  1. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-13.  1. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  1. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  1. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  1. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  1. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  1. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  1. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  1. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  1. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  1. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  1. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  1. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  1. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  1. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  1. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  1. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  2. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  3. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  4. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  4. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  4. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  4. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  4. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  4. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  4. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  4. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  5. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  5. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  5. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  5. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  5. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  5. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  5. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  5. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  5. Delivery - VC Summer Unit 2 Lovel 2004 5 VS2-14.  5. Delivery - VC Summer Unit 2 Lo	3 g Z Z S	inery – VC Sammer Unit 2 Level 220°-6" VS2-13A Sinere – VC Sammer Unit 2 Level 220°-5" VS2-131.		20 CO	741	3	3	3 6
Contract	Delivery   VC Sammer Unit 2 Lave   2025   VC2-131	Delivery   VC Surrane Unit 2 Lave   2005   VC2-131	전 품 <del>길</del> 성	Siver - VC Sunmer Unit 2 Level 200-6" VS2-131	!	a ≥/-Aug- s	::.::	ş	30 -0.7 to	C1 480 17
Harmonian   Desiron   Control   Co	Hardware Unit 2 Love   2765-5° V 22° V 44   19.	HH         Derivaty - VC Summer Unit 2 Level 2705-5* V22* V43         H         To belivery - VC Summer Unit 2 Level 2705-5* V22* V43         A         HS Sep-16*         13-Sep-16*         A         Derivaty - VC Summer Unit 2 Level 2705-5* V22* V43         A         HS Sep-16*         B Sep-16*         A         Derivaty - VC Summer Unit 2 Level 2705-5* V22* V43         A         HS Sep-16*         B Sep-16*         A         Derivaty - VC Summer Unit 2 Level 2705-5* V22* V43         A         A         HS Sep-16*         B Sep-16*         A         Derivaty - VC Summer Unit 2 Level 2705-5* V22* V44         A         A         Derivaty - VC Summer Unit 2 Level 2705-5* V22* V44         A         A         A         Desp-16*         A         B Sep-16*         A         Desp-16*         A	表望等			A (7-8-50-16		ø	18-1139 16	23-7KW-38
Line         Desirony - VG Summer Unit 2 Level 2 FG* 7 V22* 144         A         16-Sep-16         20-Sep-16         47         22-A           Line Lowey - VG Summer Unit 2 Level 2 FG* 5 V22* 145         A         16-Sep-16         A         16-Sep-16         A         16-Sep-16         A         12-Sep-16         A         B         22-A         B         A         B         B         A         B </td <td>Light Delivery - VC Sammer Unit 2 Lored 219-5" VS2-14C         4         15-Sep-16         24-Sep-16         4-17-Sep-16         4-17-Sep-16         4-17-Sep-16         4-17-Sep-16         7-17-Sep-16         4-17-Sep-16         7-17-Sep-16         4-17-Sep-16         7-17-Sep-16         7-17-Sep-16         4-17-Sep-16         7-17-Sep-16         7-17-Sep-16</td> <td>Light Delivery - VC Sammer Unit 2 Lored 219-5° VS2-14C         4         15-Sep-16         24-Sep-16         45-Sep-16         45-Sep-16         45-Sep-16         46-Sep-16         47-Sep-16         46-Sep-16         46-Sep-16</td> <td><b>3</b> 9</td> <td>3</td> <td></td> <td>4 Sept 18</td> <td></td> <td>ę.</td> <td>39-20.00 TB</td> <td>21~1681-15</td>	Light Delivery - VC Sammer Unit 2 Lored 219-5" VS2-14C         4         15-Sep-16         24-Sep-16         4-17-Sep-16         4-17-Sep-16         4-17-Sep-16         4-17-Sep-16         7-17-Sep-16         4-17-Sep-16         7-17-Sep-16         4-17-Sep-16         7-17-Sep-16         7-17-Sep-16         4-17-Sep-16         7-17-Sep-16	Light Delivery - VC Sammer Unit 2 Lored 219-5° VS2-14C         4         15-Sep-16         24-Sep-16         45-Sep-16         45-Sep-16         45-Sep-16         46-Sep-16         47-Sep-16         46-Sep-16	<b>3</b> 9	3		4 Sept 18		ę.	39-20.00 TB	21~1681-15
L.C.         Delivery - VC Summer Unit 2 Layer 2 VSC-14C         A 17-Sep-16         C1-Sep-16         A 17-Sep-16         A 17-Sep-16         A 17-Sep-16         A 17-Sep-16         A 17-Sep-16         A 18-Sep-16         A 18-Sep-16 <th< td=""><td>CE         Desirony - VC Sammer Unit 2 Layer 2 VSS-14C         A         10-Sep-16         27-Sep-16         AE         27-Sep-16         AE         27-Sep-16         AE         27-Sep-16         AE         AE</td><td>CE         Desirony - VC SARRINGE LINE Z LEWER 2 193-57 VSZ-14C         A         14 Sept-16         C1-Sept-16         A         D2-Sept-16         D2-Sept</td><td></td><td>ivery - VC Symmer Unit 2 Level 215-5" VS2-144</td><td></td><td>4 15-282-15</td><td></td><td>铎</td><td>22.44.18</td><td>25-318-38</td></th<>	CE         Desirony - VC Sammer Unit 2 Layer 2 VSS-14C         A         10-Sep-16         27-Sep-16         AE         27-Sep-16         AE         27-Sep-16         AE         27-Sep-16         AE	CE         Desirony - VC SARRINGE LINE Z LEWER 2 193-57 VSZ-14C         A         14 Sept-16         C1-Sept-16         A         D2-Sept-16         D2-Sept		ivery - VC Symmer Unit 2 Level 215-5" VS2-144		4 15-282-15		铎	22.44.18	25-318-38
Example   Line   2 Lore   269-5   922-138	Exercise   Contrary   VC Summer Unit 2 Layer 2 109-5 VSZ 134	Example Unit 2 Laye 2004-5 VSZ-13E   Fabre 12 Process		Source, 1804 2 Love 219-5" VST-145	· · · · ·	A 1000016		¥	22.40.15	26-Jus-16
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44         Delice op - V.O. Sammer Unit 2 Layer 2 HG-5 VEZ: 14A         4         20-02-10 HG-10         140 </td <td>44         Delivery - VG Sammer Unit 2 Layed 2 FG-5 VK22-14A         4         20-5-24-17         140-24-17         <th< td=""><td>44.         Delice op - V.D. Sammer Unit 2 Layed 2 FG-5 VEZ-14A         4         20-5-5-79         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-24</td><td>88</td><td></td><td></td><td>1</td><td></td><td><u>. i.</u></td><td>2007</td><td>3 3</td></th<></td>	44         Delivery - VG Sammer Unit 2 Layed 2 FG-5 VK22-14A         4         20-5-24-17         140-24-17 <th< td=""><td>44.         Delice op - V.D. Sammer Unit 2 Layed 2 FG-5 VEZ-14A         4         20-5-5-79         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-24</td><td>88</td><td></td><td></td><td>1</td><td></td><td><u>. i.</u></td><td>2007</td><td>3 3</td></th<>	44.         Delice op - V.D. Sammer Unit 2 Layed 2 FG-5 VEZ-14A         4         20-5-5-79         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-74         1-25-24	88			1		<u>. i.</u>	2007	3 3
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15   Delivery - VC Sammer Unit 2 Level 2795-5 Ve2s-1346   4   05-Cat-16   55   25   25     25   25   25   25	Company	Colored   Deciment Unit 2 Lewel 219-57 VSZ-1346   A   Or Cheb 16   O	<b>A</b>			# 34585-15		ş	22.46.36	55-815-0Z
Selveng-VO Sammer Unit 2 Level 2005-37 VS2-134	March   Delivery - VC Sammer Unit Z Level 2195'-5'V22-134	March   Delivery - VC Summer Unit Z Level 2005-8° VS2-138	5	sivery - VC Symmer Unit 2 Level 21918" VS2: 143		A (30.00 to		ş	22.45.15	F32-35
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14.   Delivery - VC Summer Unit 2 Level 219-3 'V2C-14D	14   Delivery - VC Surmer Unit 2 Level 216-37 Vec 144   Delivery - VC Surmer Unit 2 Level 216-37 Vec 145   Second 216-37 Vec 145 Vec	14   Delivery - VC Surmers Unit 2 Level 216-5 'VS2-14D	¥ 3	100 0 1 10 10 10 10 10 10 10 10 10 10 10				ķ	22-38-38	28, 58, 38
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4 Delivery - VC Sammer Unit 2 Level 2144 4 14-War-15 1255 125- 125 125 125 125 125 125 125 125 125 125	4. Delivery - VC Sammer Unit 2 Level 276-5" V22-14.  5. Delivery - VC Sammer Unit 2 Level 226-5" V52-14.  5. Delivery - VC Sammer Unit 2 Level 226-5" V52-14.  6. Delivery - VC Sammer Unit 2 Level 226-5" V53-15.  7. Delivery - VC Sammer Unit 2 L	4. Delivary - VC Summer Unit 2 Lave 1813	Į	STREET - VU EXISTRET URITE LEVER 215-6 VOL. 147		-		8	32, 22	36-106-35
11 Delivery - VC Surrows Unit 2 Lovel 2 16-50' VC22-141 4 14-500-16 19-500-16 18-50-50 68 17-50-50 50	Losivery - VC Surraws Unit 2 Lanet 2167-5" VIZ2-14      Desirery - VC Surraws Unit 2 Lanet 226-5" VIZ-152      Desirery - VC Surraws Unit 2 Lanet 226-5" VIZ-152      VCS UZ Accelerated Sickett Paret Activities to Support Sept 26-Aug-14      VCS UZ Accelerated Sickett Paret Activities to Support Sept 26-Aug-14      VCS UZ Accelerated Sickett Survative to Support Sept 26-Aug-14      VCS UZ Accelerated Sickett Survative to Support Sept 36-Aug-14      VCS UZ Accelerated Sickett Survative to Support Sept 36-Aug-14      VCS UZ Accelerated Sickett Support Sept 36-Aug-14      VCS UZ Accelerated Sickett Survative to Support Sept 36-Aug-14      VCS UZ Accelerated Sickett Sept 36-Aug-14      V	4 14-NOV-16 19-NOV-16 - NO SATRING UNIT 2 LANE 2 19-NOV-16 - NO SATRING UNIT 2 N	ş	sivery - VC Summer Unit 2 Level 218-5" VSE-141)			*	2 5	2 0	1 1 10
53 Desireny - VC Summer Unit 2 Level 2.021-57 VSD-15.5 4 (04-Day-16") 12. Dec-16	5.3 Decivery - VC Summer Unit 2 Level 2021-8" VSD-15.5 4 (200-20-16" 12-Dec-16" 12-Dec-1	53 Desireny - VC Summer Unit 2 Level 2021-8" VSD-15.5 4 (04-Day-16" 12-Dep-16" 12-Dep-16	#	tinery - V.C. Summer Lini 2 level 219-5" V32-141.		4 14-808-71		ž	22-20:15	a: - 502-702
VCS V2 Accelerated Striets Panel Activities to Support Sest 24-Aug-14 2018 Striets Reference Confidence	VCS UZ Accelerated Street Panel Activities to Support Sept 24-Aug-14.	VCS V2 Accelerated Skield Panel Authitises to Support Sept 24-Aug-14. 2018 Substantial Controlleran	TÃ.	Kivery – VO Banding Carl 2 Level 229: 5" VS2-15.3		4 08-Dec-16		88	91-585-21	2 day 27
				VCS VZ Accelerated Stiekt Panel Authilises	to Support Sept	24-Aug-14			(C) Chapt	e Corporatio

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## **Acceleration Review - Shield Panels**

Ĥ	Activity ID	Activity Name	AD	Start	Firests	Total Fisat	Late Start	Late Finish
40	S82VCDEL229VS2-16G	Delivery - VC Summer Unit 2 Level 229'-6" VS2-15G	ķ	12-Dec-16*	15-Dec-16	-7%	17-Sep-16	22-Sep-16
41	SB2VCDEL228VS2-15H	Detivery - VC Summer Unit 2 Level 229-6" VSZ: 15H	\$	20-Dec-16*	23-Dec-18	-78	17-Sep-18	22-Sep-16
42	SB2VCDEt229VS2-15F	Derivery - VC Summer Unit 21 avel 229-6" VS2-16F	4	64-380-17	89-Jan-17	-88	17-Sep-16	22-Sep-16
43	S82VCDEL229VS2-15E	Delivery - VC Summer Unit 2 Level 229: 6" VS2: 15E	4	97-Jan-17*	12-Jan-17	-9‡	17-Sep-16	22-Sep-16
44	SB2VCDE1223VS2-15A	Delivery - VC Summer Unit 2 Level 229-6" VSZ 154		13√as-17″	16-Jan-17	-54	17-Sep-16	22-Sep-18
48	SB2VCDEL229VS2-15C	Delivery - VE Summer Linit 2 Level 229-5" VS2-15C	4	14-380-17	19-Jan-17	-97	17-Sep-16	22-Sep-16
4ê	S82VCDEL229VS2-15L	Delivery - VC Summer Unit 2 Level 229'-6" VS2-15L	4	21-387-17*	26-Jan-17	-103	17-Sep-16	22-Sep-16
47	S82VCDEL229VS2-158	Delivery - VC Summer Unit 2 Level 229-6" VSZ 158	ž.		30-Jan-17			
48	SB2VCDEL229VS3-15M	Delivery - VC Summer Linit 2 Level 229-5" VS2-15M	\$		08-Fe0-17			
49	SB2VCDEL229VS2-15K	Delivery - VC Summer Unit 2 Level 229' 6" VS2-15K	4		27-F≘b-17			
50	SB2VCDEL229VS2-15D	Delivery - VC Summer Unit 2 Level 229'-6" VSZ-15D	- Z	03-Mai-17*	08-Mar-17	- 138	17-Sep-16	22-Sep-16
51	SB2VCDEL239VS2-16H	Delivery - VC Summer Linit 2 Level 239-5" VS2-16H	\$	24-Mar-17*	29-888-17	- 107	14-300/-16	21-409F-38
52	882VCDEL239VS2-16G	Delivery - VC Summer Unit 2 Level 239' 6" VS2-16G	4	05-Apr-17*	19-Apr-17	-117	14-Nov-16	18-Nov-16
53	5B2VCDEL239VS2-16J	Delivery - VO Summer Linit 2 Level 239-5" VSZ-16J	\$	06-Apt-17"	11-Apr-17	- 118	14-1/20-16	2f-906 <b>f-</b> 3f
58	SB2VCDEL239VS3-16D	Delivery - VC Summer Unit 2 Level 239'-5" VS2-16D	ķ	97-Apr-171	12-Apr-17	-119	14-Nov-16	18-NOV-16
55	SB2VCDEL2%9V52-168	Delivery - VC Stammer Unit 2 Level 239-6" VS2-168	4	12-Apr-17*	18-Aps-17	-123	14-Nov-16	18-Nov-16
58	SB2VCDEL239VS2-16A	Delivery - VO Summer Linit 2 Level 239'-5" VSZ 16A		13-8pt-17°	19-Apr-17	- 124	14-1000-16	21-401 <b>7-</b> 31
57	SB2VCDEL239VS2-16M	Delivery - VC Summer Linit 2 Level 239-6" VS2-16%	4	21-Aps-17"	26-Apr-17	-139	14-Nov-16	18-Nov-16
53	SB2WCDEL239VS2-16C	Delivery - VC Statister Unit 2 Level 239-6" VS2-16C	4	22-Aps-17*	27-Apt-17	-131	:4-Nov-16	18-Nov-16
59	SB2VCDEL299VS2-16E	Delivery - VC Summer Unit 2 Level 239'-6" VSZ-16E	4	26-Apr-17*	01-May-17	- 135	14-1000-16	81-vov-81
<b>6</b> 9	SB2VCDEL239VS2-16K	Delivery - ViD Summer Unit 2 Level 239'-6" VS2-16K	4	28-Aps-17*	04-88ay-17	-338	14-Nov-16	18-Nov-16
33	SB2VCDEL239VS2-16F	Delivery - VC Summer Unit 2 Level 239'-6" VS2-16F	4	06-May-17*	10-May-17	-143	14-Nov-16	18-Nov-16
€2	SB2VCDE1289VS2-16L	Delivery - VC Summer Unit 2 Level 239'-6" VSZ-16L		16-May-17	20-May-17	-152	14-800-16	21-90H-81



VCS U2 Accelerated Shield Penel ACM/likes to Subptivil Scapt 8518 Substantial Completion 24-A×Q IH

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## **Acceleration Review – ROS**

tcivity ID	Activity Name	RD	Start	Finish	Total Float	Late Start	Late Finish
Medillese	NCRETE - M TYPE						
2CMWCA3:044R1	POS Wall Sub-Module CAR1_04 (Sub-Assembly 4)	1	E. Sep-14	95-Sep-14	- 13	21-Aug-14	22-Aug-14
20MWCA01183R1	ROS Wali Sub-Module CA01_16 (Sub-Assembly 3)		29-Sep-14	29-Sep-14	-11		12-Sep-14
2CMWCA81272R1	ROS Wall Sub-Module CA91_27 (Sub-Assembly 2)	1	29-Sep-14	35-Sep-14	-3		26-Seg-14
2CMWCA9:337R1	POS Wall Sub-Module CAR: _33 (Sub-Assembly 7)		29-Sep-14	30-Sep-14	-2		28-Sec-14
2FWCT107XX184	ROS-Racifinspect/Store: CA37 (Steel Floor * PXS* A Room Structural Module - EL 1972	10	:02-Sep-15	17-Sep-15	-16	13-Aug-15	27-Aug-15
<b>WONDERSTAN</b>	ORM MODULES PERM.						
2PWCT080XX019	ROS-Recrimspact/Store: CB22/CB28 modules (CVS Structural Steel Wall Paneta West / No	13	54-8kg-14	15-Nov-14	-31	21-Oct-14	C3-Nov-14
	MEEDMENTS						
2PWCT0845G135	ROS-Reckinspect/Store: Steam Generator Support Column Anchor Bolts -Cont EL 84'6	1 C	27- Mar-15	12-Apr-15	- 4	24-1481-15	Ω7-Apr-15
	EINFORCING						
25WAU117XX1399	RGS-Rac/Inspecy/Store; Rebar for Wall 11 - Apr Blog - EL 117's	**************************************	: 10-Apr-15	17-Apr-55	**************************************	38-Mer-15	21 20 Marie
2PWCT0840X015	ROS-Reginspect/Store: Reber - El. 84% - Cont Bidg		53-Jun-15	17-1181-15		17-Mar-15	
2PWCT087XX101	ROS-Recilinspect/Store; Floor Reber - EL 87'6 - Cont Blido		03-Jun-15	17-2181-16	-26	28-Apr-15	
2PWCT094XX111	ROS-Reg/inspect/Stone; Reber - EL 94" - Cost Bidg	· · · · · · · · · · · · · · · · · · ·	บั\$-⊋ัยก-15	17-Jun-15		28-May-15	
	lons	<b>****</b>					
2PW AU082XX1797	ROS-Resilinaped/Store; Pipe B31,1 Penetrations Materials - EL 1176" - Aux Bidg - 11 Line	*********** 5	: 21- Jul-15	26-ડાંઇ-15	<b>*********</b>	: 05-May-15	12-May-15
2FWAU082XX1550	ROS-Reg/inspecy/Store; Install MS-FW Weldment Assembly - Shield Wall Reber Col Line 7	inaniana.	19-Feb-18	94-f\&er-16			
STELL OF THE STATE							
2PWQT050XX119	RCS-Rectinspect/Store: Steam Generator Tension Supports (Base Only) - Cont ELSO	88888888 13	05-Mar-15	15-Mar-15	888888888 - { ?	<b>::::::::::::::::::::::::::::::::::::</b>	24-Feb-15
2PWSB264XX346	POS Reckinspect Store: Striefd Wall Tension Ring & Top Harl Structural Steet		27-Jan-17	19-Feb-17		4	
	SPECIALTIES						
25WSB175XX126	ROS-Rec/inagen/Store; Int/Ext Shield Well Panels at Column Line N-N - EL 1798-1895	**************************************	14-Mar-18	28-Mer-16	888888888 -3	: (19-1/21-16	22-Mar-18
2PWSB189XX137	ROS Recompact Store: IntExt Shield Wall Panals 新Column http://www.http://www	<b></b>	18-Apr-18	93-May-18		11-Apr-18	
2PWSB198KK127	ROS Reckinspect/Store; Interf Shield Walk Panels at Column Line N. N. EL 199% 2095		15-A±8-16	29-Aug-16		16-May-16	
2FW\$#205XX137	RCS-Recrimenees/Stone; Int/Ext Shield Well: Panels at Column Une N-N - EL 2026-2193		o1D-Ocu-16	oca⊲DOeNB}		21-360-18	(
2PWSB219XX147	ROS-Recrimspact/Store: Int/Ext Shield Walt Panels at Column Line N-N - EL 21975-22976	13	18-Nov-16	35-Dec-18	-81	27-Jul-16	69-Aug-16
2PW\$B228KK157	ROS-Recilinspect/Store; Int/Ext Shield Wall Panels at Column Line N-N - EL 229%-239%	10	08-Mar-17	22-Mar-17	-118	22-5#p-16	06-Oct-16
2PWSB248XX180	ROS-Rectinspect/Store: Air Intske Structure Steet Material - EL 248'5 1/2"- 272' 11/16" - Shi	15	18-May-17	52-Jun-17	-205	28-Jul-16	10-Aug-15
24W5SB53A8W167	IROS: Recolling pact Store: IntitiExt Shield Wall Partials at Gollloin Line N-IN- E123/975-24976 142"		22- May-17	195-Jun-17		i lib-Nov-18	



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## Acceleration Review - Engineering

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3	2 N.2 (25:08   C4.05:X-	4 VC2.68542	ର ବ୍ୟବନ୍ତ <del>୬</del> କ୍ୟୁଲ୍ଲ	7		

Westinghouse/CB&I Stone & Webster – Proprietary & Confidential



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Jenkinsville, SC 29065

Email: churchcd@westinghouse.com

VIA: E-Mail

Our Reference: VSP\_VSG\_003628

CD (Hand Delivered)

August 7, 2015

Subject:

Transmittal of the V.C. Summer Units 2 & 3 AP10000® EPC Schedule Data Date August 3, 2015, Revision 777—Primavera Database Including the Current Working Schedule, Performance Measurement Baseline, Month End Reports & Installation Notes

Reference:

1) Engineering, Procurement, and Construction Agreement for AP1000® Nuclear Power Plants, Dated May 23, 2008–V.C. Summer Units 2 and 3 ("Agreement")

Attachment: A) Deliverables as Noted

Action: No Action Required

Dear Mr. Jones:

Transmitted herewith is the V.C. Summer Integrated Project Schedule (IPS) update, documenting progress through August 3, 2015. The attached files correspond to a forecasted Unit 2 Substantial Completion date of September 28, 2019. This is 101 days negative float to the June 2019 Target Substantial Completion. In order to reduce this negative float the Consortium continues to pursue schedule mitigation opportunities to support the June 2019 Target Substantial Completion.

The Consortium is pursuing mitigation opportunities on multiple fronts including but not limited to the following:

- Shield Building Assembly
  - o Optimized weld process and durations

Electronically approved records are authenticated in the Electronic Document Management System.

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- o Precision alignment to provide engineering early information for resolution of fit-up issues
- o Assumption of 30% Alternate Weld Detail confirmed during erection could reduce weld time
- o Timely delivery of tension ring and air inlet
- Nuclear Island
  - o Parallel work fronts
  - o Installation of bulk commodities performed on multiple shifts
  - Standardize supports/platforms/structural steel
  - 2nd shift with support staff

### Project management initiatives:

- Increased monitoring of the E & P organizations
- Aggressive use of milestone and issue management
- Continued utilization of the OCC/PMO Organizations
- Area management focus
- Weekly area managers meeting with 3 week look ahead
- Plan of the day (POD) led by Project Directors focused on daily expectations
- Continue development of the Construction Efficiency and Effectiveness (CEE) initiatives

The Unit 3 forecasted Substantial Completion date is June 7, 2020 and is currently 9 days positive float to the June 2020 Target Substantial Completion. The Unit 2 and 3 Substantial Completion Dates include a number of assumptions notably expediting the NNI Shield Building Modules and maintaining delivery dates for CA01 and CA20 on Unit 3. The information is preliminary in nature and the Substantial Completion dates have not been accepted by the Owner as of the date of this report.

Edit access has been provided for the users of the Citrix instance of the Primavera database for the purpose of developing customized reports. Since this schedule database contains information that is proprietary to Westinghouse and CB&I, the V.C. Summer Consortium Planners are the only individuals that are authorized for official publication related to this schedule.

Please contact Terry Elam at (803) 932-5454, or the undersigned regarding any questions concerning the information contained in this submittal.

Sincerely,

Carl Churchman

Consortium Project Director

Westinghouse Electric Company LLC

JLC/CDC/cef

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Alan D. Torres – SCE&G cc: Abney A. Smith – SCE&G Carlette Walker – SCE&G Robert B. Stokes – SCE&G April Rice - SCE&G David Lavigne - SCE&G Larry Cunningham – SCE&G Roosevelt Word - SCE&G Al Bynum - SCE&G Guy Bradley - SCE&G Bernie Hydrick - SCE&G Marion Cherry – SCE&G William Macecevic - Westinghouse Joel Hielseth – Westinghouse Daniel Magnarelli – Westinghouse Frank Gill – Westinghouse JoAnne Hyde – Westinghouse Brian McIntyre – Westinghouse Patrick Young - Westinghouse Rodney Cavalieri – Westinghouse Travis Tomb – Westinghouse Jeff Coward – Westinghouse Michael Frankle – Westinghouse Linda Ackerman – Westinghouse Duane Olcsvary – Westinghouse Lisa Cazalet - Westinghouse Eric Linhart – Westinghouse Susan May – Westinghouse Denise Cervenyak – Westinghouse

Kenneth Hollenbach – CB&I Stone & Webster Sean Burk – CB&I Stone & Webster William O. Wood – CB&I Stone & Webster Charlie White – CB&I Stone & Webster Lucinda Vasbinder – CB&I Stone & Webster Dale Garrison – CB&I Stone & Webster Brian Hobbs – CB&I Stone & Webster Kenneth Jenkins – CB&I Stone & Webster Joseph Arostegui – CB&I Stone & Webster Sparkle Glover – CB&I Stone & Webster Mike Marconi – CB&I Stone & Webster Benny Buras – CB&I Stone & Webster Bob Stoner – CB&I Stone & Webster Joseph Hughes – CB&I Stone & Webster Shimon Weiman – CB&I Stone & Webster Mark Burgess – CB&I Stone & Webster Jeff Manning – CB&I Stone & Webster Terry Elam – CB&I Stone & Webster Aaron Tibbetts – CB&I Stone & Webster W. Keith Wilkerson – CB&I Stone & Webster Thomas Moran – CB&I Stone & Webster Ian Hunt – CB&I Stone & Webster Jessica Dills – CB&I Stone & Webster Thomas Hopkins – CB&I Stone & Webster Paige Jacksin – CB&I Stone & Webster Tim Riddle - CB&I Stone & Webster Lydia Richards – CB&I Stone & Webster DCRM-EDMS@scana.com VCSNNDCorrespondence@scana.com VCSummer2&3ProjectMail@cbi.com VCSummer2&3Project@westinghouse.com DCRM-EDMS@scana.com VCSNNDCorrespondence@scana.com VCSummer2&3ProjectMail@cbi.com VCSummer2&3Project@westinghouse.com

Attachment A VSP\_VSG\_003628 August 7, 2015 Page 1 of 1

### **ATTACHMENT A**

Transmittal of the AP1000 EPC Schedule – Data Date August 3, 2015

V.C. Summer Units 2 & 3, Revision 77

Primavera Database Including the Current Working Schedule, Performance Measurement

Baseline & Installation Notes

### **Attachment A**

Enclosed herein is a CD entitled, Transmittal of the APLOWO EPC Schedule- Data Date August 3, 2015, V.C. Summer Units 2 & 3, Revision 77 Primavera Database including the Current Working Schedule Performance Measurement Baseline & Installation notes.

The following is a list of the reports contained on the CD:

READ ME FIRST installation Notes.doc

The following is a list of the databases contained on the CD:

VC Summer Month Pup 3Aug15 v7 SP12015-08-10.xer (This file to be used for installation with Primavera Version 8.3 SP1)

### The following is a list of reports contained on the CD:

2015-08-03 Month End U2 Integrated Calc Major Milestone-Key Dates.pdf

2015-08-03 Month End U3 Integrated Calc Major Milestone-Key Dates.pdf

2015-08-03 U2 Crit Path COD.pdf

2015-08-03 U3 Crit Path COD.pdf

2015-08-03 U2 Crit Path ILRT.pdf

2015-08-03 U3 Crit Path ILRT.pdf

2015-08-03 VCS BLRA Status Report.pdf



## Construction Performance Meeting

WE 12/28/14





## WE 12/28/14 Construction Performance Meeting

- Work Package Development
- WP Development Graph
- Schedule Adherence
- Site Overall Progress Curve
- Brandon Lauerman
  - 3 Week Look Ahead Work Scope
  - Material Availability
- Bill Smith
  - Weekly Performance
  - 3 Week Look Ahead Work Scope
  - Progress Curve
  - Material Availability
  - -- Issues
- Ray Sedey
  - Weekly Performance
  - 3 Week Look Ahead Work Scope
  - Progress Curve
  - Material Availability
  - Issues

- Chad Glover
  - Weekly Performance
  - 3 Week Look Ahead Work Scope
  - Progress Curve
  - Issues
- Bob Johnson
  - Weekly Performance
  - 3 Week Look Ahead Work Scope
  - Progress Curve
  - Material Availability
  - Issues
- Jason Ezell
  - Weekly Performance
  - 3 Week Look Ahead Work Scope
  - Progress Curve
- SS Engineering 2 Week Look Ahead









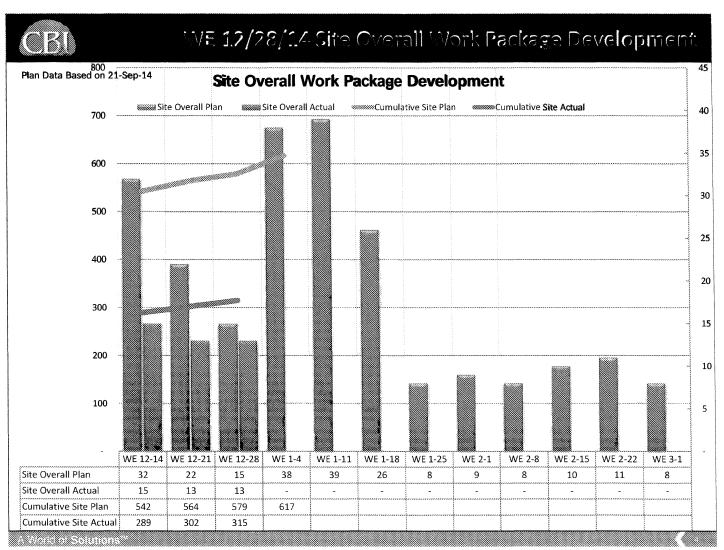




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	WE 12/28/14	WE 12/28/14	WE 12/28/14	WE 12/28/14	WE 12/28/14	WE 12/28/14	
	Total WPs Scheduled	WPs in Development	WPs Impacted by Engineering Issues	A CONTRACTOR SECTION AND A SEC	Planned Work Package Completions (Period)	Package	
Unit 2 Yard	85	11	10	1	1	4	
Unit 2 Containment	480	38	10	28	1	4	
Unit 2 Auxiliary	1,145	84	23	61	6	3	
Unit 2 Shield	125	1	-	1	-	-	
Unit 2 Turbine	2,238	80	37	43	2	2	
Unit 2 Annex	513	59	14	45	-	-	1
Unit 2 Radwaste	15	-	-	-	-	-	
Unit 2 Diesel Gen	12	-	-	-	-	-	
Unit 2 Total	4,613	273	94	179	10	13	
Unit 3 Yard	23	2	_	2	-	-	
Unit 3 Containment	378	5	1	4	-	-	
Unit 3 Auxiliary	932	4	1	3	-	-	
Unit 3 Shield	57	-	-	-	-	-	
Unit 3 Turbine	1,098	33	20	13	5	_	
Unit 3 Annex	133	-	-	-	-	-	
Unit 3 Radwaste	13	-	_	_	-	-	
Unit 3 Diesel Gen	12	-	-	-	-	-	IF Allalla, All
Unit 3 Total	2,646	44	22	22	5	-	
Site Specific	476	5	1	4	-	<u> </u>	
Total	7.735	322	117	205	15	13	

	WE 12/28/14	WE 12/28/14	WE 12/28/14	WE 12/28/14	WE 12/28/14	WE 12/28/14
	Planned Work Package Completions (ITD)	Package	WPs with Earnable Hours	Earnable Hours Remaining in Issued Work Packages	WPs Available to Work	Earnable Hours in Working Packages
Unit 2 Yard	51	47	13	49,167	5	35,000
Unit 2 Containment	74	81	27	15,497	7	3,015
Unit 2 Auxiliary	295	255	156	69,979	74	47,059
Unit 2 Shield		1	_	-	_	-
Unit 2 Turbine	298	231	136	170,536	22	39,087
Unit 2 Annex	35	14	-	-	-	-
Unit 2 Radwaste	1	2	-	-	_	-
Unit 2 Diesel Gen	-	-	-		-	-
Unit 2 Total	754	631	332	305,179	108	124,161
Unit 3 Yard	2	-	-	_	-	-
Unit 3 Containment	18	15	7	22,664	7	22,664
Unit 3 Auxiliary	81	77	44	59,812	14	30,786
Unit 3 Shield	-	_	-	-	-	-
Unit 3 Turbine	65	36	50	217,187	34	185,939
Unit 3 Annex	-	-	-	-	-	-
Unit 3 Radwaste	-	-	-	-	-	-
Unit 3 Diesel Gen	-	-	-	-	-	-
Unit 3 Total	166	128	101	299,663	55	239,389
Site Specific	419	414	245	341,513	49	124,909
Total	1,339	1,173	678	946,355	212	488,459





## WE 12/28/14 Schedule Adherence

Building/Area - Site Specific	Scheduled to Start	1	Start on Time (No)	Scheduled to Finish	Finish on Time (Yes)	Finish on Time (No)	Schedule Start Adherence	Schedule Finish Adherence
"total	82	28	54	69	32	37	34%	<b>46%</b>
Construction	35	10	25	29	11	18	29%	38%
Jason Ezell	5	0	5	5	0	5	₩ 0%	₩ 0%
Chad Glover	2	1	1	4	2	2	50%	<b>50%</b>
Bob Johnson	22	6	16	13	7	6	27%	<b>54%</b>
William (Bill) Smith	6	3	3	7 -	2	5	50%	<b>29%</b>
Cosque Engineering	16	10	6	13	9	4	63%	69%
Bob Johnson	2	0	2	2	0	2	0%	◎ 0%
Raymond Sedey	12	10	2	9	9	0	<b>83%</b>	100%
William (Bill) Smith	2	0	2	2	0	2	0%	◎ 0%
	12	2	10	17	7	10	17%	<b>41%</b>
Jason Ezell	4	0	4	9	5	4	0%	<b>56%</b>
Bob Johnson	7	1	6	7	1	6	14%	14%
William (Bill) Smith	1	1	0	1	1	0	100%	100%
Procurement	9	4	5	2	1	1	<b>44%</b>	<b>50%</b>
Jason Ezæll	3	1	2	0	0	0	33%	
Bob Johnson	6	3	3	2	1	1	<b>◎</b> 50%	<b>50%</b>

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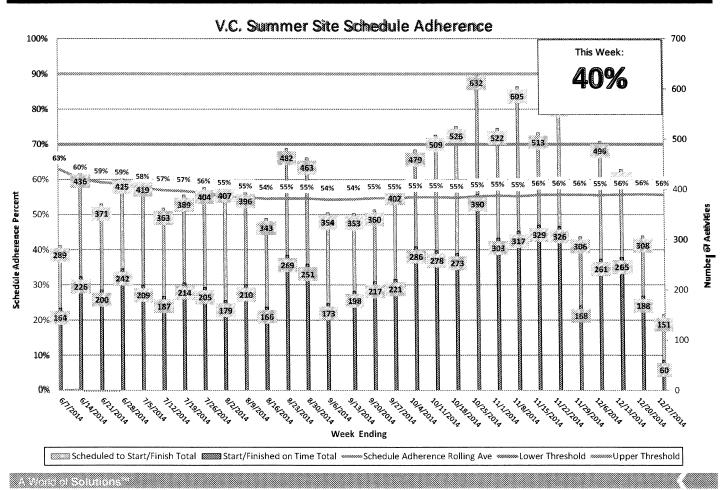


## WE 12/28/14 Schedule Adherence

Building/Area - Site Specific	Scheduled to Start		Start on Time (No)	Scheduled to Finish	Finish on Time (Yes)	Finish on Time (No)	Schedule Start Adherence	Schedule Finish Adheremce
Total	82	28	54	69	32	37	34%	46%
Sub Contracts Dept	1	1	0	1	1	0	100%	100%
William (Bill) Smith	1	1	0	1	1	0	100%	100%
Sub-Contractor	9	1	8	7	3	4	11%	43%
Jason Ezæll	1	0	1	0	0	0	₩ 0%	
Chad Glover	5	1	4	1	0	1	20%	0%
Mark Glover	0	0	0	1	0	1		0%
Bob Johnson	3	0	3	5	3	2	◎ 0%	<b>60%</b>



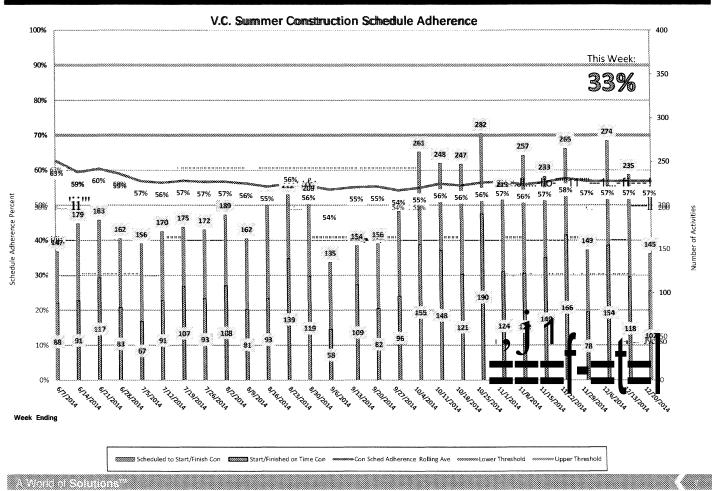
## WE 1.2/28/14 Schedule Adherence



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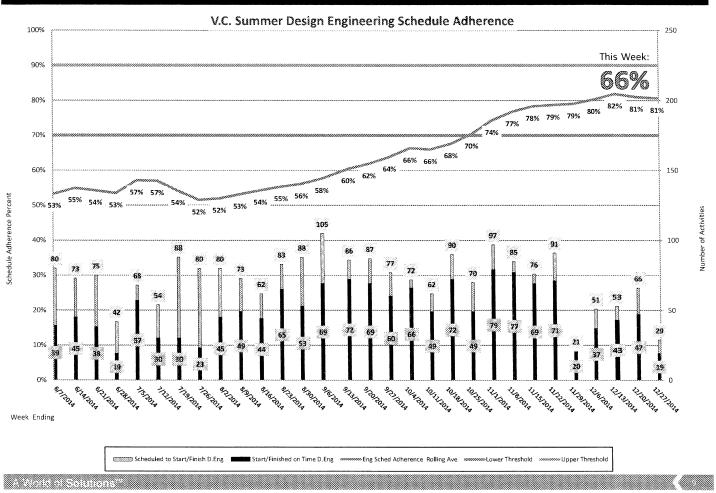
## WE 17/28/14 Schedule Adherence



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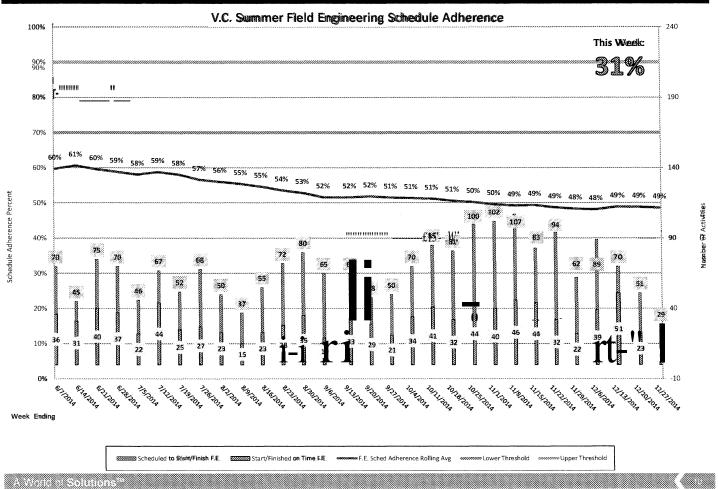


## WE 12/28/14 Schedule Adherence





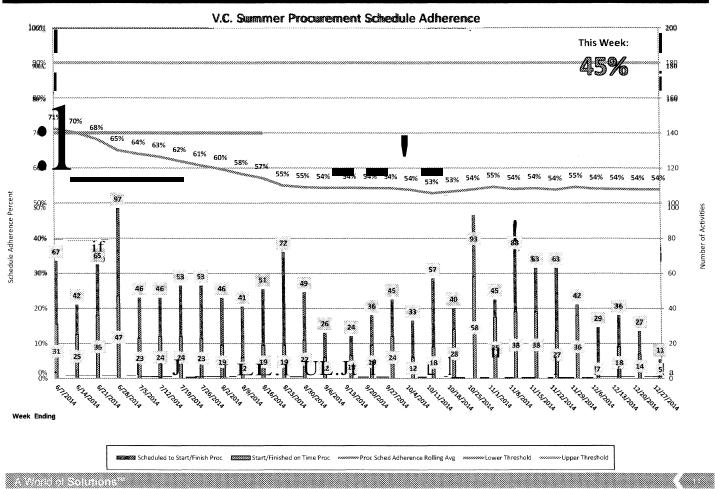
## WE 1.7/28/14 Schedule Adherence



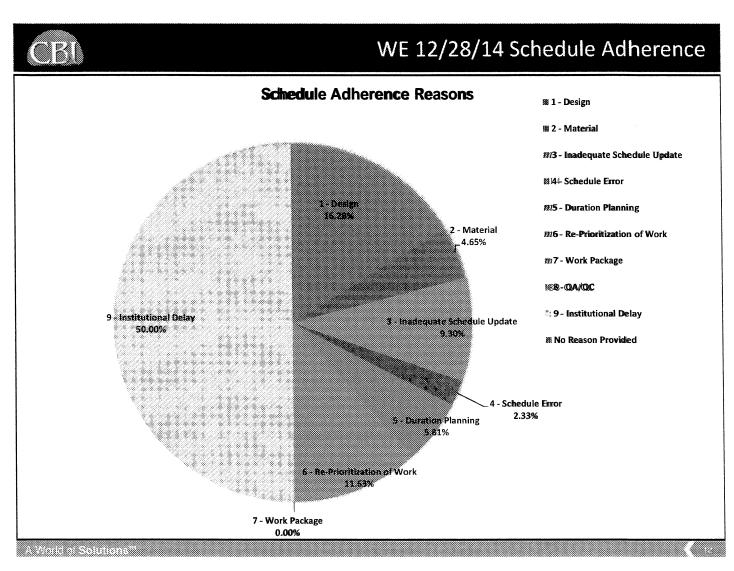
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## WE 12/28/14 Schedule Adherence



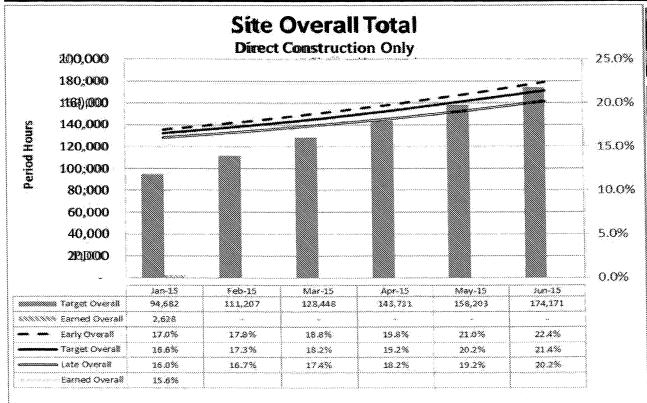
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## WE 12/28/14 Site Overall Progress Curve



4 Weeks Remaining to Earn 92,054 Hours 23,013 Hour Per Week Average Needed in January

	PHINITHE SANIOUS ID	Milestone Pesculphien	Reset Wretine Date Ag Of: Separitet 1, 2018	Menth And Missions Bate	New Bate	Acto Control one	Person Bridgeses Date	internal Mades	
1	POWWXXXXPSCW625	Approve Engineering Procurement and Construction Agreement	Complete		100	23-May-08			
1	POWINAMAP BUNIDES	Issue P.O.'s to nuclear component	Complete			20-Way-00			
		fabricators for Units 2 and 3							
2	POWXXXXPSOW626	Containment Vessels	Complete			3-Dec-08			
		Heat Removal Heat Exchanger				La constant			
3	POWXXXXPSOW627	Falbricator - First Payment: - Unit 2	Complete	-		18-Aug-08			
		Contractor Issue PO to Accumulator							
4	POW/XXXXPSCOW628	Tank Falbricator - Unit 2	Complete			31-Jul-08			
-	- San	Contractor Issue PO to Core Makeup		1		3. 23. 00			
5	POWXXXXPSOW629	Tank Fathricator - Units 2 & 3	Complete			30-Sep-08			
						P	110		
	and the second second	Contractor Issue PO to Squib Valve	OUT TO A PO						
6	POWXXXXFSCOW630	Fathricatior - Units 2 & 3	Complete	-		31-Mar-09	-		
7	POW/XXXXPSOW631	Comtractor Issue PO to Steam Generator Fathricator - Units 2 & 3	Complete			29-May-08			
/	PUWAAAMF3LWI031	Generator Fathicaton - Offits 2 & 5	Complete	1		29-Iviay-00	-		
		Comtractor Issue Long Lead Material							
		PO to Reactor Coolant Pump Falbricator				1000			
8	POWXXXXXPSCOW632	-Wmits 2 & 3	Complete			30-Jun-08	11.0		
							Dan Fre		
		Contractor Issue PO to Pressurizer				1			
9	POW/XXXXPSCOW633	Fathricattor- Units 2 & 3	Complete			18-Aug-08	-		
10	DOWNWAY AND COMMON A	Loop Pipe Falbricator - First Payment - Units 2 & 3	Complete		-	20-Jun-08			
10	POW/XXXXPSCOW634	Lead Material PO to Falbricator - Units	Complete	+		20-3011-06			
11	POW/XXXXXPSCOW635	2 and 3	Complete			21-Nov-08			
		Contractor Issue Long Lead Material							
		PO to Reactor Vessel Faltmicaton- Units					-		
12	POW/XXXXPSCOM636	2&3	Complete			29-May-08	1		Likely
						1000			
13	POWXXXXPSCOW637	Comtractor Issue PO to Integrated Head Package Fabricator - Units 2 & 3	Complete	1		31-Jul-09			
10	T CHINANANT SELVINGS /	Control Rod Drive Mechanism Issue PO		+		01 001 00			
		for Long Lead Material to Fathricattor-							
14	POWXXXXPSCOW638	Units 2 and 3 - first payment	Complete			21-Jun-09			
		Issue P.O.'s to nuclear component				17	10		
	Party Market and American	fabricators for Nuclear Island structura		1					
15	POWXXXXPSCOW639	CA20 Modules	Complete			21-Jun-09	-		1
		Start Site Specific and balance of plant					6		
16	YF\$0001	detailed design	Complete			11-Sep-07			
		Comtractor Place Notice to Proceed -	1						
17	POWXXXXPSCOW640	Units 2 & 3	Complete			31-Oct-08			
	100000000000000000000000000000000000000	Steam Generation - Issue Final PO to					-		
18	POWXXXXPSCOM641	Faltrication for Units 2 and 3	Complete			30-Jun-08			EVLIDIS
	Participated and a second and a	Issue PO for Long Lead Material (Heavy							EVUIDI
19	POW/XXXXPSCOM642	Plate and Heavy Forgings) to Fabricato	r Complete			29-Jan-10	-		Ellem A
20	POWXXXXPSOW643	Comtractor Issue Final PO to Reactor Vessel Fatbricator - Units 2 & 3	Complete			30-Sep-08		1	EXHIBIT Eilem C 10/15/18
20	CPOINCLES TINAMANTING	Variable Frequency Drive Fabricator	Complete	1	-	30-3ер-06			aliria
	POWXXXXXPSCOW644	Issue Transformer PO- Units 2 & 3	Complete			30-Apr-09			8/10/18

0	Rkimavera Modetty 16	Milestone Besselption	Reset milestone Carte As Co: September 1, 2015	Mewih ETO Milestone Bate	New Bate	Actual Bynphetide Bate	Deita Months from Reset Milesters Cate	Intertial Notes
22	CON2961	Start clearing, grubbing and grading	Complete			26-Jan-09		
23	POWXXXXPSCOM645	Core Makeup Tank Faibricator Issue Long Lead Material PO- Units 2 & 3	Complete			31-Oct-08		
24	POWXXXXPSCOW646	Acumulator Tank Falbricator Issue Long Lead Material PO- Units 2 & 3	Complete			31-Oct-08		
25	POWXXXXIPSCOW647	Pressurizer Fathrication Issue Long Lead Material PO - Units 2 & 3	Complete			31-0ct-08		
26	POW/XXXXPSCOW648	Issue PO to Faibnicatter- Second Payment: Units 2 & 3	Complete			30-Apr-09		
27	POWWXXXPSCOM649	Integrated Head Package- Issue PO to Fabricator- Units 2 and 3 - second payment	Complete			31-Jul-09		
28	POWXXXXPSCOW650	Control Rod Drive Mechanisms - Contractor Issue PO for Long Lead Material to Fabricator - Units 2 & 3	Complete			30-Jun-08		
29	POWXXXXPSCOM651	Contractor Issue PO to Passive Residual Heat Removal Heat Exchanger Fabrikator- Second Payment- Units 2 & 3	Complete			31-0ct-08		
30	CON23810	Start Parr Road intersection work.	Complete			13-Feb-09	1	
31	POW/XXXXPStOW652	Reactor Coolant Pump- Issue Final PO to Fabricator- Units 2 and 3	Complete			30-Jun-08	1	
32	POWXXXXPSCOM653	Integrated Heat Packages Faibricator Issue Long Lead Material PO- Units 2 & 3	Complete			1-Oct-09		
33	POWXXXXPSCOW654	Design Finalization Payment 3	Complete			30-Jan-09		
34	COINDOOO	Start site development	Complete			22-Aug-Q8		
35	POWXXXXPSQW655	Contractor Issue PO to Turbine Generator Fatbricattor - Units 2 & 3	Complete			19-Feb-09		
36	POWXXXXPSCOM656	Countractor Issue PO to Main Transformers Falbricattor- Units 2 & 3	Complete			25-Sep-Q9		
		Core Makeup Tank Faibricator Notice to Contractor Receipt of Long Lead						
37	POWXXXXPSOW657	Material - Units 2 & 3	Complete	_	_	30-Dec-10		
38	POWXXXXPSCIW658	Design Finalization Payment 4 Turbine Generator Fabricator Issue PO	Complete	+	-	30-Apr-09		
39	POWXXXXPSOW659	for Condenser Material - Unit 2	Complete	-	-	28-Aug-09		
40	POWXXXXPSCOW660	Reactor Coolant Pump Falbricator Issue Long Lead Material Lot 2 - Units 2 & 3	Complete			30-Apr-09		
41	POWXXXXPSIOW661	Passive Residual Heat Removal Heat Exchanger Fathricator Receipt of Long Lead Material - Units 2 & 3	Complete			27-May-10	W U	
42	POWXXXXPSOW662	Design Finalization Payment 5	Complete			31-Jul-09		
43	CON10840	Start erection of construction buildings, to include craft facilities for personnel, tools, equipment; first aid facilities; field offices for site management and support personnel; temporary warehouses; and construction hiring office.	Complete			18-Dec-Q9		
44	POWXXXXPSQWI663	Reactor Vessel Fabricator Notice to Contractor of Receipt of Flange Nozzle Shell Forging- Unit 2	Complete			28-Aug-Q9		

0	PElmawera Activity 10	Mitorione Beaulprice	Rèset Miladore Date As Coi: September 1, 2015	Month End Milestone Date	New Sale	Actual Completion Bate	Delta Magha (19m) Reset Missione Dete	Meerial Notes
45	POWXXXXPSCOW664	Design Finalization Payment 6	Complete			7-0ct-09		
46	POW/XXXXPSXOWI665	Instrumentation and Control Simulator- Contractor Issue PO to Subcontractor for Radiiation Monitor System- Units 2 & 3 Reactor Vessel Internals - Fabricator	Complete			17-Dec-09		
		Start Fit and Welding of Core Shroud	0 1			00 114 44		
47	POWWXXXPSIDW666	Assembly- Unit 2 Turbine Generator Fabricator Issue PO for Moisture Separator Richeatien/Feedwater Heater Material-	Complete			29-Jul-111		
48	POW/XXXXPSCOW667	Uniit2	Complete			30-Apr-10		
49	POWXXXXPSCOW668	Reactor Coolant Loop Pipe Falbricator Acceptance of Raw Material - Unit 2	Complete			18-Feb-10		
		Reactor Vessel Internals - Falbricator Start Weld Neutron Shield Spacer Pads					-	
50	POWXXXXPSEOW669	to Assembly- Unit 2	Complete	-		28-Aug-12		
51	POWWXXXXX	Control Rod Drive Mechanisms- Fabricator to Start Procurement of Long Lead Material- Unit 2	Complete			30-Jun-09		
52	POW/XXXXPS60W671	Contractor Notified that Pressurizer Fabricator Performed Cladding on Bottom Head - Unit 2	Complete			23-Dec-10		
53	OON/2521	Start excavation and foundation work for the standard plant for Unit 2	Complete		-	15-Mar-10		
54	POWWXXXXPSEOW672	Steam Generator Fabricator Notice to Contractor of Receipt of 2nd Steam Generator Tubesheet Forging - Unit 2	Complete			30-Apr-10		
55	POWXXXXPS@WI673	Reactor Vessel Falbricator Notice to Contractor of Outlet Nozzle Welding to Flange Nozzle Shell Completion - Unit 2	1			10-Dec-10		
56	POWXXXXXPSCOW674	Turbine Generator Falbrication Notice to Contractor Condenser Falbrication Stantted - Unit 2	Complete			17-May-10		
57	CONM1145	Complete preparations for receiving the first module on site for Unit 2.	Complete			11-Jun-10		
58	POWWXXXPScOW675	Steam Generator Fathricatior Notice to Contractor of Receipt of 1st Steam Generator Transition Cone Forging- Unit 2	Complete			211-Apr-10		
59	POWXXXXPScOW676	Reactor Coolant Pump Falbricator Notice to Contractor of Manufacturing of Casing Completion- Unit 2	Complete			16-Nov-10		
60	POW/XXXXHTSCOW677	Reactor Coolant Loop Pipe Fabricator Notice to Contractor of Machining, Heat Treating & Non-Destructive Testing Completion - Unit 2	Complete			20-Mar-12		

Core Makeup Tank Fabricator Notice to Contractor of Salaistactor Or Salaistactor Salaistactor Salaistactor Salaistactor Salaistactor Salaistactor Notice to Complete   1-Feb-11	A Report	Reimavera Activity ID	eu.	Reset Milestone-Date As Of: September 1, 2015	Month End Mitestene Date	New Date	Aggal Compress Date	Deta Midness Son	Interrial Notes
Main Holst Drum and Wire Repe-	61	POWWXXXPSCOW678	Comtractor of Satisfactory Completion	Complete			26-Nov-12		
Fabricator to Start Procurement of Long Lead Material- Unit 3 Complete Comp	62	POWXXXXPSCOW679	Main Hoist Drum and Wire Rope- Units 2 & 3	Complete			1-Feb-11		
Contractor Condenser Ready to Ship- Complete  26-Mar-12  Complete  26-Jul-12  Steam Generator Fabricator Notice to Contractor of Receipt of 1st Steam Generator Tubing - Unit 2  Pressurizer Fabricator Notice to Contractor of Welding of Upper and Intermediate Shells Complete  67 POW/OCOUPSCIMESS  8 Reactor Vessel Fabricator Notice to Contractor of Welding of Upper and Intermediate Shells Complete  68 POW/OCOUPSCIMESS  8 Reactor Vessel Fabricator Notice to Contractor of Closure Head Cladding Complete  69 POW/OCOUPSCIMESS  60 POW/OCOUPSCIMESS  61 POW/OCOUPSCIMESS  61 POW/OCOUPSCIMESS  62 POW/OCOUPSCIMESS  63 POW/OCOUPSCIMESS  64 POW/OCOUPSCIMESS  65 POW/OCOUPSCIMESS  65 POW/OCOUPSCIMESS  66 POW/OCOUPSCIMESS  66 POW/OCOUPSCIMESS  67 POW/OCOUPSCIMESS  67 POW/OCOUPSCIMESS  67 POW/OCOUPSCIMESS  68 POW/OCOUPSCIMESS  69 POW/OCOUPSCIMESS  69 POW/OCOUPSCIMESS  60 POW/OC	63	POWXXXXPSQW680	Falbrication to Start Procurement of	Complete			14-Jun-11		
Steam Generator Fabricator Notice to Contractor of Receipt of 1st Steam Generator Tubing Institation Foliation Fabricator Notice to Contractor of Wedding of Upper and Intermediate Shells Complete  67 POW/OODORPSIDW683 2  68 POW/OODORPSIDW683 2  68 Reactor Vessel Fabrication Notice to Contractor of Closure Head Cladding Complete Shells Complete Complete  69 POW/OODORPSIDW684 Completimen—Unit 3 Complete  69 2CCININBM/OCI164 Reactor Coolant Pump Fabricator Notice to Complete Placement Complete  70 POW/OODORPSIDW685 Fabricator Start Fit and Welding of Core Shroud Assembly - Unit 2 Complete  71 POW/OODORPSIDW686 Core Shroud Assembly - Unit 2 Complete  72 POW/OODORPSIDW687 Reactor Coolant Loop Pipe - Shipment Generator Tabricator Notice to Contractor of Completion of 1st Steam Generator Tubing Installation - Unit 2 Complete  73 POW/OODORPSIDW688 Reactor Coolant Loop Pipe - Shipment of Equipment Clatch Assembly & Rod Travel Housing) to Head Supplierr - Unit 2 Complete  74 POW/OODORPSIDW688 Head Supplierr - Unit 2 Complete  75 POW/OODORPSIDW689 Head Supplierr - Unit 2 Complete  76 POW/OODORPSIDW689 Steam Generator Fabricator Notice to Contractor of Welding of Lower Shell to Bottom Head Campliterium - Unit 2 Complete  76 POW/OODORPSIDW689 Generator Tubing Installation - Unit 2 Complete  77 POW/OODORPSIDW689 Head Supplierr - Unit 2 Complete  78 POW/OODORPSIDW689 Head Supplierr - Unit 2 Complete  79 POW/OODORPSIDW689 Head Camplieticon of Ind Steam Generator Tubing Installation - Unit 2 Complete  79 POW/OODORPSIDW689 Head Camplieticon of Ind Steam Generator Tubing Installation - Unit 2 Complete  79 POW/OODORPSIDW689 Head Camplieticon of Ind Steam Generator Tubing Installation - Unit 2 Complete  70 POW/OODORPSIDW689 Head Camplieticon of Ind Steam Generator Tubing Installation - Unit 2 Complete  79 POW/OODORPSIDW689 Generator Tubing Installation - Unit 2 Complete  79 POW/OODORPSIDW689 Complete Indicator Notice to Contractor of Complete Indicator Notice to Contractor of Complete Indicator Notice to Contractor of Complete Indi	64	POWXXXXPSQW681	Contractor Condenser Ready to Ship-	Complete		0	26-Mar-12		
Steam Generator Fabricator Notice to Contractor of Receipt of 1st Steam Generator Fubricator Notice to Complete  POW/OODDIPSCOMESS 2  POW/OODDIPSCOMESS 3 2  Reactor Vessel Fabricator Notice to Contractor of Welding of Upper and Intermediate Shells Complete  Reactor Vessel Fabricator Notice to Contractor of Closure Head Cladding Complete  POW/OODDIPSCOMESS 4  Reactor Vessel Fabricator Notice to Complete  Reactor Coolant Pump Fabricator Complete  POW/OODDIPSCOMESS 4  Reactor Coolant Pump Fabricator Notice to Complete  POW/OODDIPSCOMESS 6  Reactor Coolant Pump Fabricator Notice to Complete  POW/OODDIPSCOMESS 6  Core Shroud Assembly - Unit 2  Complete  POW/OODDIPSCOMESS 7  POW/OODDIPSCOMESS 7  Reactor Coolant Loop Pipe - Shipment Complete  POW/OODDIPSCOMESS 7  Reactor Coolant Loop Pipe - Shipment Generator Tubing Installation - Unit 2  Complete  POW/OODDIPSCOMESS 7  Reactor Coolant Loop Pipe - Shipment Generator Tubing Installation - Unit 2  Complete  POW/OODDIPSCOMESS 6  Reactor Coolant Loop Pipe - Shipment Generator Tubing Installation - Unit 2  Complete  POW/OODDIPSCOMESS 7  Reactor Coolant Loop Pipe - Shipment Generator Tubing Installation - Unit 2  Complete  POW/OODDIPSCOMESS 7  Reactor Coolant Loop Pipe - Shipment Generator Tubing Installation - Unit 2  Complete  POW/OODDIPSCOMESS 7  Reactor Coolant Loop Pipe - Shipment Generator Tubing Installation - Unit 2  Complete  Steam Generator Tubing Installation - Unit 2  Complete  POW/OODDIPSCOMESS 8  Steam Generator Tubing Installation - Unit 2  Steam Generator Tubing Installation - Unit 2  Complete  Steam Generator Tubing Installation - Unit 2  Complete  A-May-12	65	2CCNINBMXX046	Start placement of mud mat for Unit 2	Complete			26-Jul-12		
Contractor of Welding of Upper and Intermediate Shells Completism—Unit Intermediate Shells Completism—Unit 2 Reactor Vessel Fabricator Notice to Complete 28-Oxtl-11  Reactor Coolant Loop Pipe - Shipment 73 POW/ODOXIPSIXW689 POW/ODOXIPSIXW689 POW/ODOXIPSIXW689 POW/ODOXIPSIXW689 POW/ODOXIPSIXW689 POW/ODOXIPSIXW689 Contractor of Completion of 1st Steam Generator Tubing Installation - Unit 2 Complete 27-Jan-12  Reactor Coolant Loop Pipe - Shipment of Equipment (Latch Assembly & Road Travel Housing) to Head Supplier Unit 2 Complete 27-Jan-12  POW/ODOXIPSIXW689 Pow/ODOXIPSIXW689 Pow/ODOXIPSIXW689 Pow/ODOXIPSIXW689 Contractor of Completion of 1st Steam Generator Tubing Installation - Unit 2 Complete 27-Jan-12  POW/ODOXIPSIXW689 P			Steam Generator Fabricator Notice to Contractor of Receipt of 1st Steam				28-Sep-10		
Reactor Vessel Fathricator Notice to Contractor of Closure Head Cladding Complete 28-Jun-12  8egin Unit 2 first nuclear concrete placement Complete 9-Mar-13  8egin Unit 2 first nuclear concrete placement Complete 9-Mar-13  70 POW/XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	67	POWYXXXPSCOW683	Contractor of Welding of Upper and Intermediate Shells Completion - Unit	Complete			28-Oct-11		
POWYCOCKIPSKOW689 POWYCOCKIPSKOW689 POWYCOCKIPSKOW689 POWCOCKIPSKOW689 Pow		POW/XXXXXPSCDW684	Contractor of Closure Head Cladding				28-Jun-12		
Notice to Contractor of Stator Core Completion - Unit 2  POW/XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	69	2CCNINBMXX1164	placement	Complete			9-Mar-13		
POW/XXXXXXPSXXVV6891 Core Shroud Assembly - Unit 2 Complete 29-Jul-111  Steam Generator Fabricator Notice to Completion of 1st Steam Generator Tubing Installation - Unit 2 Complete 27-Jan-12  Reactor Coolant Loop Pipe - Shipment of Equipment to Sitize- Unit 2 Complete 19-Dec-13  Control Rod Drive Mechanism - Ship Remainder of Equipment (Latch Assembly & Rod Travel Housing) to Head Supplier- Unit 2 Complete 16-Jul-12  Pressurizer Fabricator Notice to Contractor of Welding of Lower Shell to Bottom Head Completium - Unit 2 Complete 22-Dec-11  Steam Generator Fabricator Notice to Contractor of Completion of 2nd Steam Generator Tubing Installation - Unit 2 Complete 4-May-12	70	POWXXXXPSOW685	Notice to Contractor of Stator Core	Complete			1-Dec-11		
Complete 27-Jan-12  Resector Coolant Loop Pipe - Shipment of Equipment to Sibse - Unit 2  Complete 19-Dec-13  POW/XXXXXVVFSXXW688 of Complete 19-Dec-13  Control Rod Drive Mechanism - Ship Remainder of Equipment (Latch Assembly & Rod Travel Housing) to Head Supplierr - Unit 2  Complete 16-Jul-12  Pressurizer Falbricatior Notice to Complete 22-Dec-111  Steam Generator Faibricatior Notice to Contractor of Welding of Lower Shell to Bottom Head Completium - Unit 2  Steam Generator Faibricatior Notice to Contractor of Completion of 2nd Steam Generator Tubing Installiation - Unit 2  Complete 4-May-12	71	POWXXXXPSCOW686		Complete			29-Jul-11		
73 POW/XXXXPSXXW688 of Equilipment to Site- Unit 2 Complete 19-Dec-13  Control Rod Drive Mechanism - Ship Remainder of Equilipment (Latch Assembly & Rod Travel Housing) to  POW/XXXXPSXXW689 Head Supplier - Unit 2 Complete 16-Jul-12  Pressurizer Fathricatior Notice to Contractor of Welding of Lower Shell to Bottom Head Commpletion - Unit 2 Complete 22-Dec-11  Steam Generator Fathricator Notice to Contractor of Completion of 2nd Steam Pow/XXXXIPSXXW691 Generator Tubing Installation - Unit 2 Complete 4-May-12	72	POWWOOKXPSEOWI687	Constructor of Completion of 1st Steam	Complete			27-Jan-12		
Remainder of Equipment (Latch Assembly & Rod Travel Housing) to PDWXXXXPSXDW689 Head Supplier - Unit 2 Complete  Pressurizer Fathricator Notice to Contractor of Welding of Lower Shell to Bottom Head Commpletion - Unit 2 Complete  Steam Generator Fathricator Notice to Contractor of Completion of 2nd Steam PDWXXXXPSXDW691 Generator Tubing Installation - Unit 2 Complete  4-May-12	73	POWXXXXPSCOW688		Complete		p. Service	19-Dec-13		
Contractor of Welding of Lower Shell to Bottom Head Commplications - Unit 2  Complete  22-Dec-111  Steam Generator Faibricator Notice to Contractor of Completion of 2nd Steam POWXXXXVPSXXWISXVIIISXVIIIISXVIIIIIIIIIIIIIIIIIII	74	POWXXXXXPSOW689	Remainder of Equipment (Latch Assembly & Rod Travel Housing) to	Complete			16-Jul-12		
Contractor of Completion of 2nd Steam 76 POWXXXXPSt0W691 Generator Tubing Installation- Unit 2 Complete 4-May-12	75	POWXXXXXXPSEOW690	Contractor of Welding of Lower Shell	Complete			22-Dec-11		
	76	POWXXXXIPSOW691	Contractor of Completion of 2nd Steam Generator Tubing Installatiom - Unit 2	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1					
77         POW/XXXXPSXXW692         Design Finalization Payment 14         Complete         30-Sep-11           78         2CCCT071XXL10         Set module CA04 for Unit 2         Complete         27-Sep-13							_		

Tracking 10	Primevera Activity ID	Milestone Beseription	September 1, 2815	Ments and Milestone	New Date	Meteral Compilention Brite	Better Resident Deta	Internal Notes	
79	POWXXXXPSCW693	Passive Residual Heat Removal Heat Exchanger Fabricator Notice to Comtractor of Final Post Weld Heat Treatment:- Unit 2	Complete			24-May-11			
80	POWXXXXPSOW694	Passive Residual Heat Removal Heat Exchanger Fathricator Notice to Contractor of Completion of Tubing - Unit 2	Complete			31-May-12			-
81	POWXXXXPSCOW695	Polar Crane Fathricator Notice to Combractor of Girder Fathrication Completion - Unit 2	Complete			23-0ct-12			
82	POWXXXXPSCOM696	Turbine Generator Fabricator Notice to Comtractor Condenser Ready to Shipp- Unit 3	Complete			26-Aug-13			
83	2CMCT104XX020	Set Comtainment Vessel ring #1 for Unit 2  Reactor Coolant Pump Fabricator	Complete			3-Jun-14			
84	POWXXXXPSCOW697	Delivery of Casings to Port of Exportt- Unit 2	Complete			11-Jul-13			
85	POWXXXXPS(OW698	Reactor Coolant Pump Fathricator Notice to Comtractor of Stator Core Completion - Unit 3	Complete			18-Jul-13			
86	POWXXXXPSCM 699	Reactor Vessel Fallmicator Notice to Contractor of Receipt of Core Shell Forging- Unit 3	Complete			29-Mar-12			
87	POWXXXXPSCM 700	Contractor Notified that Pressurizer Faibnicator Penformed Cladding on Bottom Head - Unit 3	Complete			9-Nov-11			
88	2COCT1/07XX017	Set Nuclear Island structural module CA03 for Unit 2 Squib Valve Fathricator Notice to	Complete			22-Jul-16			
89	POWXXXXPSCM701	Combractor of Completion of Assembly and Test for Squib Valve Handware- Unit 2	Complete			10-May-12			
90	POWXXXXPSCM702	Accumulator Tank Fathricator Notice to Contractor of Satisfactory Completion of Hydrotlestt- Unit 3	Complete			16-Sep-13			
91	POWXXXXPStOW703	Polar Crane Fatbricator Notice to Comtractor of Electric Panel Assembly Completion - Unit 2	Complete			6-Mar-13			
92	2CMCT084XX086	Start containment large bore pipe supports for Unit 2	Complete			13-Jun-14		Milestone completed	
93	POWXXXXPSCM704	Integrated Head Package- Shipment o Equipment to Site- Unit 2	Complete			9-May-14		Milestone completed	
94	POWXXXXPSQWI705	Reactior Coolant Pump Falbricator Notice to Comtractor of Final Stator Assembly Completion - Unit 2	Complete			17-Dec-13	3	1.5	
95	POWXXXXPSOM706	Steam Generator Fabricator Notice to Contractor of Completion of 2nd Stean Generator Tubing Installation - Unit 3	n Complete			7-Feb-14			
96	POWXXXXPSCM707	Steam Generator Fabricator Notice to Contractor of Satisfactory Completion of 1st Steam Generator Hydrotesti- Unit 2				14-Jan-13			

racengre	RAIMOVEZE ACTIVITY (D	2	Reset Milestone Date As O: Sepertifier 1, 2015	Month End Milestene Date	New Date	Retuin On Pletton Date	Dette Months train	Intertial Notes
97	2COCT1135XX110	Start concrete fill of Nuclear Island structural modules CA01 and CA02 for Uniit 2	10-Dec-16	19-May-17			+5	
98	POW/XXXXPSIOW/708	Passive Residual Heat Removal Heat Exchanger - Delivery of Equilipment to Port of Emilmy - Unit 2	Complete			25-Apr-14		Milestone completed
99	POWXXXXPSCM709	Refueling Machine Falbricator Notice to Contractor of Satisfactory Completion of Factory Acceptance Test - Unit 2	Complete			16-Dec-14	_	Completed in December 2014.
100	DOWN/N/W/W/W/DOWN/N/	Deliver Reactor Vessel Internals to Port	Complete			29-Jan-16		Milestone completed
100	POWWXXXXPSOW710 2CMCT205XX020	of Exportt- Unit 2 Set Unit 2 Containment Vessel #3	Complete 15-Feb-17	29-Apr-17		29-Jan-16	+2	Milestone completed
101	ZONICIZUSAAUZU	Steam Generation - Contractor	13-1-60-17	23-Mp1-1/			74	
102	POWXXXXPSOW711	Acceptance of Equipment at Port of Entry - Unit 2	Complete			15-Jan-15	_	Completed in January 2015.
		Turbine Generator Fabricator Notice to						
		Contractor Turbine Generator Ready to						
103	POWXXXXPSOW712	Shipp- Unit 2	Complete			28-May-13	-	
104	POWXXXXPSCOWI713	Pressurizer Faibricator Notice to Contractor of Satisfactory Completion of Hydrotesti- Unit 3	Complete			18-Mar-1S		
	Constitution of the	Polar Crame - Shipment of Equipment						Delay due to schedule refinement and
105	POWXXXXPSCOW714	to Sitte- Unit 2	30-Jun-16	31-Mar-17			+9	schedule re-sequencing.
106	2PWCT100XX103	Receive Unit 2 Reactor Vessel on site from fabricator	Complete			31-Jul-13		
107	2CMCT100RX130	Set Unit 2 Reactor Vessel	Complete			30-Aug-16	0	Milestone completed.
108	POWXXXXPSOM715	Steam Generator Faibricator Notice to Contractor of Completion of 2nd Channel Head to Tubesheet Assembly Welding- Unit 3	Complete			24-Apr-15		Millestone completed.
109	POWXXXXPS&OW716	Reactior Coolant Pump Falbricator Notice to Contractor of Final Stator Assembly Completion - Unit 3	Complete			30-Aug-16	_	Milestone completed.
110	POWXXXXPSEOW717	Reactor Coolant Pump - Shipment of Equipment to Site (2 Reactor Coolant Pumps))- Unit 2	Complete			23-Feb-17		
111	3CCNINBMXX1164	Place first nuclear concrete for Unit 3	Complete	1		2-Nov-13	_	Milestone completed.
112	2CMCT084SG127	Set Unit 2 Steam Generator	Complete	-	-	12-Jan-17	-	Milestone completed.
113	POWXXXXPSOW718	Main Transformers Ready to Ship - Unit 2	Complete			31-Jul-13		Milestone completed.
114	P3WXXXXPS@WB48	Complete Unit 3 Steam Generator Hydrotest at fabricator	Complete			21-Aug-15		Milestone completed.
115	2CMCT066XX200	Set Unit 2 Containment Vessel Bottom Head on basemat legs	Complete			22-May-13		I mare our share seem
116	2CMCT118RC135	Set Unit 2 Pressurizer Vessel	11-May-17				+1	
		Reactior Coolant Pump Falbricator Notice to Contractor of Satisfactory Completion of Factory Acceptance Test						
117	POWXXXXPSCOW720	- Umilt3	1-Jul-17	30-Jun-17			-1	
118	POWXXXXPSEDW721	Deliver Reactor Vessel Internals to Port of Export - Unit 3	11-Aug-17	7 30-Jun-17			-2	Delay due to subsequent delay in predecesso schedule activities.

	Primavera Medivity ID	Milestone Dass righter	Reset Mystone Date As Ot: September:1,2015	Month End Milesters Date	New Eate	Metual expletton Date	Delta Milonia tom Reset Miloniane Date	Internal Notes
119	POW/XXXXPSCOW722	Main Transformers Falbricator Issue PO for Material - Unit 3	Complete			15-Jan-15	_	Completed in Jamuary 2015.
120	2CMCT118RN195	Complete welding of Unit 2 Passive Residual Heat Removal System piping	19-May-17	14-Aug-17			+3	
121	POWXXXXPSCOWI723	Steam Generator - Contractor Acceptance of Equipment at Port of Entrry - Unit 3	Complete			16-Mar-17	_	Casing welding in progress on 3A SG. Shipment expected by 12/31/16
122	PDWXXXXPSCM724	Refueling Machime-Shipment of Equipment to Site - Unit 3	15-May-17	25-Jul-17			+2	Delay due to schedule refinement and schedule re-sequencing.
123	2CMCTI2339MH130	Set Unit 2 Polar Crane	28-Jun-17	8-Jan-18			+7	
124	POWXXXXPSCM725	Reactor Coolant Pumps - Shipment of Equipment to Site - Unit 3	1-Sep-17	31-Aug-17			-1	
125	POWXXXXPSCOW726	Main Transformers Ready to Shipp- Unit 3	Complete			29-Jul-15		Completed in July 2015
126	POW/XXXXPSOW/727	Spient Fuel Storage Raxdk- Shiipment of Last Rack Modulie- Unit 3	Complete			3-Sep-15		Milestone completed.
127	2CEAU066XX1145	Start electrical cable pulling in Unit 2 Auxillary Building	6-0ct-16	6-Jul-17			+9	
128	2VSMILPM00052	Complete Unit 2 Reactor Coolant System cold hydro	16-Aug-18	31-Dec-18			+4	Delay due to subsequent delay in predecessors schedule activities.
129	2VSIDPT00458	Activate class 1E DC power in Unit 2 Auxilary Building.	1-Nov-17	24-Mar-18			+4	Delay due to subsequent delay in predecesso schedule activities.
130	2VSMILPM00076	Complete Unit 2 hot functional tests	17-Nov-18				+5	Delay due to subsequent delay in predecessor schedule activities.
131	3CMCT20SXX020	Install Unit 3 ring 3 for containment vessel	29-Nov-17	30-Jul-18			+8	
132	2VSCSFLIT1235	Load Unit 2 nuclear fuel	10-May-19	26-Aug-19			+3	Delay due to subsequent delay in predecesso schedule activities.
133	2VSCSPTHHR110	Unit 2 Substantial Completion	31-Aug-19	18-Feb-20			+6	
134	3CM CT100RX130	Set Unit 3 Reactor Vessel	14-Dec-17	9-Nov-17			-1	
135	3CMCT084SG127	Set Unit 3 Steam Generator #2	21-Feb-18	31-Jan-18			-1	
136	3CMCT118RC135	Set Unit 3 Pressurizer Vessel	30-Mar-18	15-Jun-18			+3	
137	3CMCT118RN195 3CMCT2399MH130	Complete welding of Unit 3 Passive Residual Heat Removal System piping Set Unit 3 polar crane	11-Apr-18 24-May-18	-			-1 +1	
139	3CCSB264CR197	Start Unit 3 Shield Building roof slab rebar placement	7-Jul-19	29-Jul-19			0	The activity ID was incorrect for this item and the reset date is based on a turbine building activity instead of the shield building. A project letter has been submitted for permission to reconcile.
	DOTALISMO TO THE	Start Unit 3 Auxiliary Building electrical	The second second					
140	3CEAW066XX1145 3VSIDPT000458	cable pulling  Activate Unit 3 Auxiliary Building class 1E DC power	18-May-17 21-Sep-18				+4	
142	3VSMILPM00052	Complete Unit 3 Reactor Coolant System cold hydro	15-Aug-19				-1	
143	3VSMILPM00076	Complete Unit 3 hot functional test	11-Nov-19				-2	
144	3VSCSFLT1235	Complete Unit 3 nuclear fuel load	11-Mar-20		+		-1	
145	3VSCS100PP340	Begin Unit 3 full power operation	12-Jul-20	_	_		-1	
146	3VSCSPTHHR110	Unit 3 Substantial Completion	31-Aug-20				0	1

To: YOUNG, KYLE MATTHEW[KYLE.YOUNG@scana.com]; Terry Elam

(elamtw@westinghouse.com)[elamtw@westinghouse.com]

Cc: TORRES, ALAN D[ATORRES@scana.com]

From: LANIER, CYNTHIA B

Sent: Thur 9/8/2016 4:35:07 PM Subject: Follow-up Action Items

Final ORS Agenda August 23-24 2016.docx

ORS Follow Up Action Items August 23-24 2016 Site Visit.docx

Summary of ORS August 2016 Site Visit.docx

### Terry and Kyle,

I'm following up on two action items from last month's ORS briefing: the Mandatory Constraints spreadsheet and the 4-Box replacement. We're working with the ORS to distribute the monthly agenda earlier than in the past. To do this, we agreed to send them requested information as soon as possible so that they can review and formulate the agenda questions.

Thank you,

Cindy

## Follow up action items noted during the monthly debriefing. Alan/Kyle/Terry:

- Terry to provide "Mandatory Constraints" spreadsheet to Skip and Ron; Skip and Ron to review prior to Cindy posting to E-room
- Kyle to provide status of AB/SB roof panel's fabrication (K.I) (this can be provided in September's briefing)
- Kyle notified that the 4-Box report was discontinued. A new report is being developed. Kyle to notify B&F When new report is issued. B&F to provide new report to ORS.

### Dan Magnarelli: Provided by Dan on Sept 2.

- Follow up on agenda item C.2 Advise whether the streamlined procurement procedure PS106-01-09 was issued by 2016-07-31 as scheduled and highlight improvements (July MPSR slide 16)
- Follow up on agenda item C.3 Define the "standard blanket", "min/max blanket" and "consignment blanket" purchase orders (July MPSR slide 17)

From: LANIER, CYNTHIA B

Sent: Tuesday, September 06, 2016 4:04IPM

To: LANIER, CYNTHIA B

Subject: FW: ORS August 23-24 2016 Site Visit

From: LANIER, CYNTHIA B

**Sent:** Thursday, August 25, 2016 1:26 PM **To:** ARCHIE, JEFFREY B; JONES, RONALD A

Cc: HINSON, BYRON W; SMITH, ABNEY A JR; LANIER, CYNTHIA B; BEST, EMILY (BETTY); KOCHEMS, KEVIN R; TORRES, ALAN D; YOUNG, KYLE MAITTHEW; CUNNINGHAM, LARRY P; STOKES, ROBERT B;

BRADLEY, GUY M; LAWIGNE, DAVID A; RICE, APRIL R; THOMPSON, RYDER CLARK

Subject: ORS August 23-24 2016 Site Visit



Jeff and Ron,

In preparation for Monday's debrief meeting I've attached the Summary, Agenda and Follow Up Action Items from the August 23-24 ORS site visit. Please let me know if you have any questions concerning these attachments.

Thank you,

### EMMY Lanieu

Contract Compliance & Controls SCANA Services- New Nuclear Deployment direct line: 801-941-9662 clanier@scana.com

Confidential ORS\_SCEG\_00527444

## SCE&G VC Summer Units 2 & 3 August 23 & 24, 2016 ORS Site Visit Agenda

(Tuesday-Mjædmæsday)

I. Tuesday Site Tour @ 10:30 a.m.

SCANA: Skip Smith, Caroline Whatley, Cindy Lanier

ORS: Allyn Powell, Gene Soulit, Gary Jones, Tamieca Lary, Jakeyla James

(Troucers-MABB-CA01, U3-CA20, U2 TB-Bay 1 Repairs, TB Bldg. Walk through. Tours of the onsite pipe fabrication shop, and a near completed cooling tower should be scheduled when sufficient progress can be demonstrated and weather permits.)

### Tuesday - August 23, 2016

ensing (April)
eduling/Risk Management (Terry Elam/Kyle) @ ORS
struction (Kyle)
vice Building Change Order (Dave Lavigne)
1

### Wednesday — August 24, 2016

8:00-9:00	Project Status and Transition (Carl Churchman, Jeff Hawkins) @ ORS
9:00-9:30	Commercial (Skip, Shirley, Betty, Cindy, Adam)
9:30-10:00	Quality Assurance (Larry)
10:00-11:00	Engineering (Brad)
1:00-2:00	Functional Area Assessmeent- QA, Field Engineering, Welding (Dan Magnaretti)
2:00-2:30	Debrief (Skip, Shirley, Cindy, Betty, Adam)
3:00-4:00	Debrief (Ron, Jeff, Byron, Steve (optional))

### II. Contractor Briefings

- a) Project Status and Transition (Carl Churchman, Jeff Hawkins)
  - 1. Please provide an update on the WEC/Fluor transition. Please identify new management staff and provide an organization chart and roster if available. (This will be a standing agenda item until the transition is completed). Please identify full time Fluor employees on the organization charts. How many full time, long-term Fluor employees have been added to the project team?
  - 2. Please provide the plan for accelerating the production to an overall rate of 3%/month and provide a comparison to historical rates. (Repeated from previous meeting).
  - 3. Please provide an update on Fluor's recruitment efforts to increase the craft labor staffing

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Comment Key
Blue --- Carryover
Redel- Gary Jones
Gotem: -- Gene Soult

- Discuss the current status of Subcontracts No. 1203 (Fire Detection/Protection); 1210 (Bldg. 69 Personnel Entry Bldg.; 2440 (Craft Augmentation); and 2441 (Floor Module Assembly) (WS, dated 2016-08-08, p.1 thru 4)
- 5. Discuss the status and schedule for the site-wide implementation of a second shift (Project Risk Management Meeting Summary, dated 2016-07-18, p. 8)
- 6. Please discuss the results of the Fluor resource loaded integrated project schedule revision when available. Discuss the comparison of the Fluor construction unit rates and productivity factors with those currently used by CB&I. It is noted that when the Fluor performance factors are incorporated the performance curves will essentially be restarted making any comparison difficult. How is SCE&G planning to deal with this? (Repeated from previous meetings).
- 7. 7/19/16- Monthly Progress Report-7/21/16 (MPR)-Pg. 14 indicates the Fluor Resource Loaded Schedule is estimated to be completed in 9 Months. Please indicate the Month that the schedule will be available for review.
- 8. MPR- Pg. 28 indicates PF at +2.0 and Page 29 displays planned at 1.3% with earned at 0.6%. What is the computed impact on meeting the GSCD's for U2 & U3?
- 9. MPR-Pg. 43 Identifies Craft needs- Iron workers, Riggers in all areas. How much is the lack of skilled craft contributing to the poor PF performance?
- 10.MPR-Pg. 44- Indicates Rebar installation rate measured at 35 hrs. /ton vs. > 100hrs/ton Actual. What are the major delays to improving performance in this area?
- 11. MPR-Pg. 44- indicates Overlay Plate installation at 0.3 hrs. earned verses 20-40 hours actual- What are the major delays to improving performance in this area?
- 12. MPR- Pg. 49- indicates that 30% of the reason craft are not retained is absenteeism. What is the most reported reason for workers not showing up to work? Are exit interviews being conducted? If so, what is the primary reason for leaving?
- 13. MPR-Pg. 54- Discusses work delayed by material needs and sites work Packages should be prepared 20 days before construction start date. What Percent of the Work Packages are meeting this requirement?
- 14. POD-7/28/16 Pg. 23- It was noted in the POD meeting that the Bldg. 18 night shift quit the previous night. Please explain the reasons behind this and the number of workers involved.
- 15. WCM- 8/8/16- Pg. 28/42- Annex Bldg. resource levels does not support any mitigation schedule needs. Discusses 2-pilot Hispanic Crews. What are the total Resource needs to mitigate the Annex building from impacting Critical Path?
- b) Scheduling/Risk Management (Terry Elam/Kyle)
  - 1. Please take us through the primary critical paths on each unit highlighting any activities which are being artificially constrained.
  - 2. Please discuss how Unit 2 HFT, CPT/ILRT and initial energization can be delayed by almost 2 months with no impact on the completion date (July MPSR Slides, Slide 23)

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- 3. Please clarify the meaning of the footnote on percent complete that seems to indicate that "actual" is target from December 2015, rather actual value (July MPSR Slides, Slide 27)
- 4. When will the Operation and I&C activities be loaded into the integrated schedule?
- c) Functional Area Assessment QA, Field Engineering, Welding (Dan Magnarelli)
  - Please provide an update on the FAA results and actions from the welding program,
     Quality Control Program and Field Engineering Program
  - 2. Please advise whether the streamlined procurement procedure PS106-01-09 was issued by 2016-07-31 as scheduled and highlight the improvements (July MPSR Slides, Slide 16)
  - Please define the "standard blanket", "Min/Max blanket" and "consignment blanket" purchase orders (July MPSR Slides, Slide 17)

### III. Construction Progress

- a) Weekly Construction Metrics (to include discussion of critical work fronts & status of project relative to the revised integrated schedule) No Questions
- b) Project EPC Contract Transition
  - 1. MPR-Pg. 58 What prompted a new procedure for steel bolting being more stringent than before?
- c) Unit 2 Nuclear Island
  - 1. NI wall pours continue to fail to meet target dates. Please discuss <u>additional</u> <u>mitigation</u> and improvement activities that are underway. This appears to be a continuing issue. (Repeated from previous meeting).
  - Summarize the major issues that continue to delay the Layer 6 pours and discuss the mitigation strategies being implemented and their effectiveness. (Repeated from previous meeting).
  - 3. Discuss the issues delaying the delivery of the SPL steel and the mitigation strategies underway. (Repeated from previous meeting). Discuss the issues delaying these placements and mitigation underway. (Repeated from previous meeting).
  - 4. Discuss the status of the onsite work on the major Unit 2 super modules and the fit-ups and alignments between the installed super modules (POD Summary, dated 2016-08-15, p. 23).
  - 5. Discuss the issues delaying the pour of Layer 6/7 east. (no specific reference).
  - 6. POD- 8/9/166- POD Pg. 25- Missing penetrations for CA01 East, What does this mean?
  - 7. POD- 8/9/16- Pg. 31-A.4 Rx. Vessel Calculation Errors, Please explain what this pertains to and potential impact

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- 8. POD-8/10/16- Pg. 10/42-165 Embeds are missing for several scheduled jobs. Please describe why these were not identified during the pre-job plan process.
- 9. Weekly Construction Matrix- (WCM) 8/8/16- Pg. 28/42- Auxiliary Building Resource Levels do not support schedule mitigation efforts, Significant needs. Please provide the current schedule impact due to the limited resources.
- 10. P-Risk 145S- CA01 Post set completion 7/14 update pg. 26 strongly suggests an FME be applied to CA01 in accordance with the risk strategy. Is there an FME in place for CA01?
- 11. P-Risk- 161- Pg. 43- Indicates 4 months late of optimized schedule and 0% probability to meet at this time. Layer 6&7 holds. When will this delay be factored into the schedule?

### d) Unit 2 Turbine Building

- 1. Discuss the status of the repair of the cold joint on the First Bay pour. (Repeated from previous meetings).
- 2. Discuss the status and issues associated with the next major construction milestone in the unit 2 TB (No specific reference).
- 3. POD-7/28/16-Pg. 49- Engineering issue noted that Condensers A, B, C Hotwells have active corrosion- Please explain why and the extent of corrosion.
- 4. POD- 8/9/16-Pg. 44- TB 1<sup>st</sup> Bay- Boring has been completed, what is the final **d**isposition for the voided **concretE**; area?

### e) Unit 3 Nuclear lisland

- Concrete pour dates for walls and floors continue to slip. Please provide the recovery plan
  to maintain the schedule. Please note that status is available, but no plan to improve or
  recover has been made available. (Repeated from previous meeting).
- 2. Discuss the status of the in situ work associated with CA20 (No specific reference).
- 3. WCM- 8/8/16- Pg.31/42- U-3 CA20 lack of availability of skilled craft affecting progress-Please discuss the impact the lack of skilled craft in this area is having on U3 Critical Path Schedule.
- **4.** WCM-8/8/16 Pg. 33/42- KB module work indicates Manpower shortage. Please provide the type and quantify of craft needed and schedule for having them available for work.
- 5. WSR- 8/8/16- Pg. 15- U3 Containment Schedule suspended CBI Services for blasting, limited resources, also, schedule indicates CB stopped progress at 4/30/16, and SB stopped at layer F1 East in March 16. How are these holds affecting the SCD of Unit 3? The U3 current V-1-Manual Project Keys Dates still indicate an early finish for U3 (8/4/20).

### f) Unit 3 Turbine Building

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- TB work still delayed to lack of manpower- What is the status of improving the Manpower requirements on site? (Repeated from previous meetings).
- 2. Confirm that the condenser sections have been set on 2016-08-19 per the schedule (July MPSR Slides, Slide 43).
- g) Cooling Towers No Questions
- h) Raw Water System Please discuss why the status of the redesign of the pipe bridge has not changed for several months and provide the targeted schedule **for completion**. (**Repeated from previous meeting**).
- i) Offsite Water System--- Please identify the system turnover date (Repeated from previous meetings).
- j) Containment Vessels, including the schedule for ring sets- Address any updates associated with the rigging weight limit for Unit 2 CV Ring#2 (No specific reference).
- k) Shield Buildings
  - Discuss the status and schedule for the AB/SB roof panel's fabrication and provide additional details on the design, including any delays in the design completion. (Repeated from the previous meetings).
  - 2. Provide an update on the issues associated with completing the pour of RC01/02. (No specific reference).
  - 3. Discuss the issues with the feedwater bellows being unusable and the planned mitigation (POD Summary, dated 2016-08-15, p.54).
  - 4. The erection durations for the SB RC portions between Vogtle and VCS appear to be drastically different 6.8 vs. 15.1 months for the first unit and 7.3 vs. 14.4 for the second unit. Please discuss. (Project Risk Management Meeting Summary, p. 23).
  - 5. Risk-158-S. SB needs 9 month mitigation, Pg. 23 What action is WEC taking to reduce the Engineering Restraints noted in the 8/10/16 Hardwick? Probability of mitigating the entire 9 months is almound 10%
- I) Onsite and offsite stonagge- No Questions
- m) Structural & mechanical modules fabrication and schedule (delivery schedules for all fabrication vendors; include a discussion of Unit 3)
  - Discuss the mitigation plans for the critical U2/U3 mechanical modules. Schedules
    continue to be delayed. It is noted that even the shipment of de-seeped sub-module parts

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- from CBI-LC are being delayed. What additional actions are planned? A plan from Fluor was due 2016-05-16. (Repeated from previous meetings).
- Discuss the ressults of the mitigation plan for the critical mechanical and floor modules...
   (Repeated from previous meetings).
- Discuss the current delivery schedule for Unit 3 CA03 provided by CB&I-LC (No specific reference).

### n) Annex Building

 What are the mitigation strategies for recovering the Annex Building schedule? (No specific reference). (Repeated from previous meetings).

### Mise:

- 1. Vendor Site Fours:
  - a. NNI
- 2. What are your biggest challenges and/or concerns?

### IV. Library and Permitting

- a) MRRC visits/reviews
  - 1. Discuss the results of the 2016-08-10 meeting with the NRC on the LEVY ISG-111 issue (WCM, dated 2016-08-15, p. 2)
  - 2. Discuss the results of the NRC Senior Management Quarterly Exit Meeting held on 2016-08-04 (Licensing Weekly Report to the ORS, dated 2016-07-25, p.2).
  - 3. Discuss the results of the NRC inspection re. Part 21- Non-Conforming Pipe Spools performed 2016-08-08 thru 2016-08-12 (Licensing Weekly Report to the ORS, dated 2016-07-25, p.1).
  - 4. Discuss any feedback from the NRC public meeting on 2016-08-16 (Licensing Weekly Report to the ORS, dated 2016-07-25, p.2).
  - 5. MRC Integrated Inspection Report (6/30/16) 3 Green findings, Please discuss the program aspect of these findings.
  - 6. WCM-8/8/16- Noted VCS Received CAS Approval by NRC- Congratulations
- b) License Amendment Requests (LARs) and Preliminary Amendment Requests (PARs)
  - Please address the status of LAIR 13=Q9 (WEC LAR 02B) and 14-13 and WEC LARs 774, 53, 90, 49, 81, 122, 129, 134 and 140 at this and subsequent meetings until each is resolved. All these appear to be of concern to construction efforts. (Repeated from previous meeting).

Mise: What afte your biggest challenges and/or concems?

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### V. Equipment

- a) Doosan
  - 1. Unit 3 Steam Generators
- b) Mangiarotti
  - Passive Residual Heat Removal (PRHR) Heat Exchangers (discuss the status and schedule of repairs (Repeated from previous meeting).
  - 2. Discuss the status and schedule for resolving the recently identified quality issue with subcontractors. (No specific reference). (Repeated from previous meeting).
- c) Curtiss Wright/EMD Reactor Coolant Pumps
- d) SPX Copes Vulcan Squib Valves
- e) POD- 8/16/16-Pg. 40 Procurement need for Switchgear and breaktërs- Please explain why this equipment hasn't already been procured.

### VI. Engineering

- 1. Discuss the Aircraft Impact Analysis licensing basis review that is being conducted (WCM, dated 2016-08-15, p. 6).
- 2. Discuss the results of the meeting with WEC on freeze seals and the current status (WCM, dated 2016-08-15, p. 6).

Misse: What are your biggest challenges and/or concerns?

### VII. Financial/Commercial

- a) Overall Status of Budget
- b) Status of Change Orders
- c) BLRA Milestones
  - 1. Discuss the status of the Construction Milestone Payment Schedule (No specific reference).
- d) D-2- CompiliancE) Matrix Manual --June 2016- Received Mandatory Hist of Spare Parts- Do you have a cost estimate for this list?

Mise: What are your biggest challenges and/or concerns?

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### VIII. Quality Assurance

- 1. Provide an update on the status of the closeout of the preventive maintenance/storage issues. (Repeated from previous meetings).
- 2. Discuss the results of the WEC/WECTEC CAP audit which exited on 2016-08-17 (WCM, dated 2016-08-15, p. 4).
- 3. Discuss the significant results of any audits or surveillances conducted during the last month (On-going action item for subsequent meeting)
- 4. Provide updates on the status of the shelf-life issue, the chemical control issue and laydown area material issues that were discussed last month (No specific reference).
- 5. POD-7/12/16- Pg. 66- ASME Section III Spool Hydro issues at Laurens and Aecon. What is the issue?
- 6. POD-8/16/16- Pg. 6- Please provide an assessment of the CAP Backlog Closure since Day 1 of new management team.
- 7. POD-8/16/16- Pg. 32- What is the issue with the Accumulators, CMTs and Pressurizer-Ref.- VSG 1100-GNR1-4
- 8. POD- 8/16/16- Pg. 32- Reactor Coolant Pump Piping QC Hold. What is the purpose of the hold?
- 9. Q-8-Weekly Status Report ("WSR") Pg. 10- WEC/SCE&G Trending Self-Assessment conducted 8/15/16- Please highlight results of self-assessment.

Misc.: What are your biggest challenges and/or concerns?

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Comment Key
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Green -- Gene Soult

## August 23 & 24 2016 ORS Briefing Schedule and Action Items

### Follow up action items noted during the monthly debriefing.

### Alan/Kyle/Terry:

- Terry to provide "Mandatory Constraints" spreadsheet to Skip and Ron; Skip and Ron to review prior to Cindy posting to E-room
- Kyle to provide status of AB/SB roof panel's fabrication (K.I)
- Kyle notified that the 4-Box report was discontinued. A new report is being developed. Kyle to notify B&F when new report is issued. B&F to provide new report to ORS.

### Dan Magnamelli:

- Follow up on agenda item C.2 Advise whether the streamlined procurement procedure PS1 06-01-09 was issued by 2016-07-31 as scheduled and highlight improvements (July MPSR slide 16)
- Follow up on agenda item C.3 Define the "standard blanket", "min/max blanket" and "consignment blanket" purchase orders (July MPSR slide 17)

### Brad Stokes:

- Identify/Discuss the backlog tracking mechanism to capture U2 design changes and ensure they are
  incorporated into U3 if appropriate. This continues to be a source of confusion/concern for ORS. They
  understand there is a process to identify changes; but the process to ensure the changes are
  incorporated into the trailing unit is not clear.
- Results of Aircraft Impact Analysis
- Provide resolution paper of the piping "freeze seals" issue
- November onsite meeting Provide update on Program Development Status Andrea Ster\_dis

### Larry Cunningham:

· No follow up action items

### Guy Bradley:

- Provide a written high-level status of the Maximo and Champs efforts for September's onsite visit (Guy will be out of the office during this onsite visit)
- Attend the October onsite meeting to provide IT status update to include Maximo and Champs

### April/Ryder:

- No follow up action items for Licensing
- Ryder to attend next month's briefing to discuss iTAAC items: (1) Closed ITAACs. (2) What is the next substantial increase in ITAACs? If we keep pushing ITAACs out, how will we manage the increased peak?

### Skip/Betty/Shirley/Cindy

- Continue briefing format minus separate FAA discussion; reassess schedule in October
- Skip to get with Byron to discuss testimony amendment for Service Building change order. If we change our testimony, this will impact ORS testimony.

### Possible off-site tours for ORS:

- NNI –prooteentlial October
- Chima- potential fall of 2016

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## August 23-24, 2016 ORS Site Visit Summary

Gary Jones and Gene Sault attended the manager briefing sessions. Allyn Powell was absent.

Tour of the U2/U3 project site— Kyle led the tour on site, covering such areas as Unit 2 NI, Unit 3 NI, Unit 2 Turbine Building and Annex Building, CV rings, and MAB. During the tour, Gary Jones commented on the positive progress of the project particularly regarding the Annex Building.

Presentations by WEC/Fluor personmet I- Just like last month, two presentations were covered with the ORS. Using an excerpt of slides from the August Project Review Meeting presentation, Carl Churchman and Jeff Hawkins provided an update on the status of the project, the project schedule, and their top five focus areas. Noted was the initiative to bring in Spanish speaking workforce to supplement the onsite craft resources. ORS continued their interest in Fluor's evaluation of unit rates and the resulting impact on craft labor and resource issues to include attrition and absenteeism. ORS also continued to express the project's need for a resource-loaded integrated project schedule. Dan Magnarelli and Team Leads from WECTEC//Hiwor provided deep dive discussions into Functional Area Assessment (FAA) for QC, Field Engineering and Welding. The ORS does have a better understanding of the FAA process due to the last 2 months of deep dive sessions by Dan and Team Leads. There are no additional FAA deep dives planned at this time. The ORS will be interested in knowing the effectiveness of the FAAs as the process continuees.

Briefings by NND management:—NND management personnel (Kyle (Alan), Betty, Skip, Larry, Jerrod Ewing (Brad), and April) individually briefed the ORS to address the specific questions outlined by the ORS agenda. A few ad hoc questions were asked by the ORS as is normal. Terry Elam provided an update on the project schedule. Mark Hagan provided input from the Risk Management process as it related to the schedule. Andrea Sterdis provided an update on the development of Emgineering and Operational Readiness programs. Andrea will provide a project update to the ORS during the November 2016 onsite briefing. Finally, Skip requested the ORS provide their fimalized agenda to us no later than Tuesday a week prior to the onsite briefings. Currently the agenda is finalized on Thursday of that week. This leaves little time for the managers to adequately prepare responses. To assist the ORS with their agenda preparation, we agreed to provide the initial Comsortium's Monthly Project Review Meeting slides, marked as 'preliminary' and to continue providing the Owner's Project Review Meeting minutes in a timely manner. The ORS understands changes may be made to the initial meeting slides. The slides along with SCESG's Monthly Project Review Meeting Minutes, the Weekly Constituction Metrics and the Plan of the Day are adequate material for the ORS to prepare the agenda.

### In Support of the Filing

- We provided a status update on some of the change orders included in the recent filing and provided associated documentation.
- Dave Lawigne discussed the Service Building change order. ORS was interested in how we would amend our
  filing testimony and the impacts that would have to the ORS testimony. ORS to discuss this with Byron and
  Ron during debriefing meeting.

ORS debrief with our tearm—At the conclusion of the standard briefings on Wednesday afternoon, we confirmed the action items identified during the various briefings. As normal, most of the action items relate to information/topics the ORS would like to cover during future onsite visit(s). With the exception of the FAA presentations, the ORS would like to keep generally the same agenda for the remainder of the year to include continued discussions with Carl Churchman and Jeff Hawkins, and Terry Elam and Alan/Kyle for scheduling and construction. It was noted that Carl and Jeff's time with the ORS was limited to one hour to be respectful of their workload and commitments. Again, the ORS indicated that the meetings with Carl and Jeff could occur quarterly after the hearing. Gary Jones reiterated his pleasure with the progress of the project and hoped the progress would continue. He also indicated continued focus remains on finalizing the construction milestone payment schedule, setting of the reactor vessel and receiving a resource-loaded integrated project schedule.

ORS debrief with senior SCERIG/SCANA management - The ORS concluded their August 2016 site visit with a debrief with Ron Jones and Byron Hinson.